

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/8/19	Confer with Client and Jimmy Horn (husband) re facts of case, tenure denial and legal analysis of possible discrimination claims.	2.70				2.70		2.70	1
3/18/19	Confer with Client and husband re tenure denial, comparisons with other professor and other evidence supporting discrimination claims.	2.20				2.20		2.20	1
3/19/19	Begin drafting CCAFR appeal and request for reconsideration to President GFenves to reverse tenure decision including discrimination claims, review of comparator evidence of similarly situated professors obtained by Client through Public Info Requests.	4.20				4.20		4.20	1
3/20/19	Continue drafting CCAFR appeal and request for reconsideration to President GFenves to reverse tenure decision including discrimination claims, review of comparator evidence of similarly situated professors obtained by Client through Public Info Requests, and draft emails to and review of emails from Client and phone conferences with Client re same and facts/info/evidence re tenure denial and comparators,	7.60				7.60		7.60	1
3/21/19	Continue drafting CCAFR appeal and request for reconsideration to President GFenves to reverse tenure decision including discrimination claims, review of comparator evidence of similarly situated professors obtained by Client through Public Info Requests, and draft emails to and review of emails from Client and phone conferences with Client re same and facts/info/evidence re tenure denial and comparators.	9.80				9.80		9.80	1

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/22/19	Continue drafting CCAFR appeal and request for reconsideration to President GFenves to reverse tenure decision including discrimination claims, review of comparator evidence of similarly situated professors obtained by Client through Public Info Requests, and emails to, review of emails from, and phone conferences with Client re same and facts/info/evidence re tenure denial and comparators	5.90				5.90		5.90	1
3/23/19	Continue drafting CCAFR appeal and request for reconsideration to President GFenves to reverse tenure decision including discrimination claims, review of comparator evidence of similarly situated professors obtained by Client through Public Info Requests, and draft emails to and review of emails from Client and phone conferences with Client re same and facts/info/evidence re tenure denial and comparators,	5.90				6.40	0.50	5.90	1
3/24/19	Continue drafting CCAFR appeal and request for reconsideration to President GFenves to reverse tenure decision including discrimination claims, review of comparator evidence of similarly situated professors obtained by Client through Public Info Requests, and emails to (and review of emails from) Client re same and facts/info/evidence re tenure denial and comparators	6.30				7.30	1.00	6.30	1
3/25/19	Continue drafting and finalize CCAFR appeal and request for reconsideration to President GFenves to reverse tenure decision including discrimination claims, comparisons to similarly situated professors, and draft emails to and review of emails from, and phone conferences with Client re same, facts/info/evidence re tenure denial and comparators.	7.00				9.00	2.00	7.00	1
3/26/19	Exchange emails with Client re CCAFR appeal and appeal to President GFenves	0.90				0.90		0.90	1

1. Pre-Suit

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9. Trial

11. Settlement

RSN: Robert S. Notzon

2. Pleadings

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8.1 Trial Prep

10.1 Post Trial

12. Workplace Issues

RWS: Robert W. Schmidt

3. Rule 16 Case Mgmt.

6. MTD (Doc. 22)

8.2 Focus Group

10.2 Fees & Costs

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	to reverse tenure decision and obtaining additional documents through public information act re same.								
3/28/19	Draft letter and email to Client re preservation of records, explanation of privileged and non-privileged communications, and related issues in preparation for possible litigation.	0.30				0.30		0.30	1
3/28/19	Draft letter of representation to UT counsel and forwarding tenure information.	0.40				0.40		0.40	1
3/28/19	Exchange emails with EN re CCAFR appeal and public information requests to obtain additional documents.	1.10				1.10		1.10	1
4/2/19	Exchange emails with Client and JHorn re CCAFR appeal, tenure denial facts and communications with department chair and other colleagues as possible witnesses.	2.30				2.30		2.30	1
4/3/19	Exchange emails with Client re Client's interview with CCAFR committee and phone conference with Client re same.	2.30				2.30		2.30	1
4/4/19	Exchange emails with Client re CCAFR appeal, CCAFR questions to ask Dean, Chair and other key witnesses, and communication with colleague re same and help as possible supporter.	1.60				1.60		1.60	1
4/8/19	Review redacted version of CCAFR appeal and letter to president requesting reconsideration and draft email to JHorn re same.	0.40				0.40		0.40	1

1. Pre-Suit  
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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
4/15/19	Exchange emails with Client and JHorn re any response to CCAFR appeal and letter to president and communications with UT counsel re attempt to resolve legal claims/tenure situation.	0.40				0.40		0.40	1
4/16/19	Exchange emails with Client and JHorn re any response to CCAFR appeal and final arguments/request for reconsideration.	0.30				0.30		0.30	1
4/29/19	Review CCAFR opinion re possible discrimination and tenure review abnormalities (1.00) and phone conference (0.60) with Client and JHorn re same.	1.60				1.60		1.60	1
5/1/19	Exchange emails with Client and JHorn re CCAFR appeal, need to file EEOC charge of discrimination, and obtaining additional documents through public information request.	0.50				0.50		0.50	1
5/3/19	Confer with Client re facts of case, potential legal claims, CCAFR appeal and filing EEOC charge of discrimination.	2.00				2.00		2.00	1
5/9/19	Review Client documents re tenure denial, draft and revise EEOC Charge of Discrimination, and draft emails to and review emails from Client re same.	2.60				2.60		2.60	1
5/10/19	Continue review of case documents, edit and finalize EEOC Charge of Discrimination, and draft emails to and review emails from Client re same.	1.80				1.80		1.80	1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
5/15/19	Review President GGenves response and rejection of CCAFR decision on tenure discrimination and abnormalities, draft emails to and review emails from Client re same, and draft letter to UT attorney Sentz conveying same and EEOC Charge of Discrimination.	1.90				1.90		1.90	1
5/17/19	Exchange emails with UT attorney Sentz re EEOC charge of discrimination.	0.10				0.10		0.10	1
6/20/19	Exchange emails with Client re right to sue letter and deadline for filing lawsuit.	0.30				0.30		0.30	1
6/20/19	Draft FOIA letter to EEOC requesting Charge of Discrimination file.	0.10				0.10		0.10	1
7/2/19	Exchange emails with Client and JHorn re next steps. statute of limitations, and possible litigation.	0.10				0.10		0.10	1
7/12/19	Request for specific documents to review prior to initial consultation (0.25, reduced to 0.00); initial contact from EN re denial of tenure case at UT seeking representation for litigation (0.50, reduced to 0.00).	0.25	0.75	0.50	0.25				1
7/13/19	R&R of EN docs.	3.00	3.00		3.00				1
7/15/19	Schedule initial consultation.	0.00	0.10	0.10	0.00				1
7/15/19	Get approval from EN to speak with RWS re representation up to this point (0.50, reduced to 0.25).	0.25	0.50	0.25	0.25				1
7/15/19	Further R&R of EN docs (3.00, reduced to 2.00).	2.00	3.00	1.00	2.00				1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
7/15/19	Discuss EN’s new case with student intern and legal processes and burdens ahead in preparation of the work the intern will be able to perform and contribute (0.50, reduced to 0.25).	0.25	0.50	0.25	0.25				1
7/16/19	Initial consultation meeting w/ EN and JHorn.	3.00	3.00		3.00				1
7/18/19	Draft email(s) to and review email(s) from: Clients re hiring Robert Notzon (RSN) as litigation co-counsel.	0.00				0.20	0.20	0.00	1
7/18/19	Email to RWS re representation and joint representation.	0.10	0.10		0.10				1
7/19/19	Confer w/ RWS re joint representation.	0.00	1.00	1.00	0.00				1
7/20/19	Email w/ EN re joint representation and needed meeting to discuss.	0.10	0.10		0.10				1
7/21//19	Further questions of EN in preparation for the joint rep meeting and schedule joint rep meeting (0.60, reduced to 0.00).	0.00	0.60	0.60	0.00				1
7/21/19	Exchange emails with Client re possible discrimination issues relating to retention of graduate students.	0.30				0.30		0.30	1
7/22/19	R&R of EN's responses to my questions.	0.50	0.75	0.25	0.50				1
7/22/19	Move schedule for the joint rep meeting.	0.00	0.10	0.10	0.00				1
7/25/19	Exchange emails with Client and RSN re review of EEOC charge of discrimination file, right to sue determination and impact on litigation and phone conference with RN regarding same.	0.50				0.50		0.50	1

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
7/25/19	Discussion w/ RWS re: EEOC request for additional information from EN (0.50); R&R of the EEOC file from RWS (2.50, reduced to 2.00).	2.00	2.50	0.50	2.00				1
8/1/19	Meet with Client, RSN and JHorn re facts of the case and filing lawsuit (3.00, reduced to 2.0; review documents: Client emails with Chair ATewfik, request for pregnancy extension documents and research from RSN re valuation of tenure denial (0.70); Phone conference with RN regarding research and documentation on case thus far (1.50, reduced to 1.25); discussion w/ EN and RN regarding litigation strategy and options (0.50).	4.35				5.60	1.25	4.35	1
8/1/19	Research on economic value of tenure (2.50, reduced to 1.50); joint representation meeting w/ EN, JHorn, and RWS (3.00, reduced to 2.00); review of additional documentation provided by EN (re a comparator to EN that received tenure but had not been pregnant or taken pregnancy leave and pregnancy leave form and pregnancy leave policies (2.00, reduced to 1.50); discussion of research and documentation on case thus far w/ RWS and intern re next steps (1.50, reduced to 1.25); discussion w/ EN re our thoughts and her take on direction to proceed (0.50).	6.75	9.50	2.75	6.75				1
8/8/19	Exchange emails with Client and RSN re Client requesting leave of absence and continuing academic work to improve litigation posture (0.25) and phone conference with RSN re same and prior administrative appeals a and case law re same and possible prerequisite to lawsuit (0.75); phone conference with RN and EN regarding facts of case and potential legal claims (1.50 reduced to 1.00).	2.00				2.50	0.50	2.00	1

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
8/8/19	Clarify details of the case w/ EN and RWS as due diligence in signing on to the case as counsel of record (1.50); instructions to EN and her husband (JHorn) re saving and sending docs to me for preserving accuracy and authenticity and removing work product and attorney client privileged information (0.25); R&R of additional docs produced by EN and RWS from administrative process (3.00, reduced to 2.50); discussion w/ RWS re administrative appeal (0.75); discussion w/ RWS re retainer, terms of representation and scheduling in the near term (1.00, reduced to 0.00); prepare details of retainer agreement and set up cloud-based folder for the team (0.60, reduced to 0.00).	5.00	7.10	2.10	5.00				1
8/9/19	R&R of RWS's proposed retainer agreement (0.25); edits to proposed retainer agreement (0.75).	0.00	1.00	1.00	0.00				1
8/12/19	Discussion w/ RWS re retainer edits (0.75); responding to EN requests for updates and information on case and retainer (0.25); send retainer to EN for review (0.10).	0.00	0.85	0.85	0.00				1
8/13/19	Discussion w/ RWS on EN's retainer questions comments (0.50); R&R of EN's edits and questions on the retainer (0.50).	0.00	1.00	1.00	0.00				1
8/14/19	Edits to retainer based on EN's comments/questions.	0.00	0.50	0.50	0.00				1
8/14/19	Discussion w/ RWS on retainer changes (0.25); discussion w/ RWS and EN on retainer (0.50).	0.00	0.75	0.75	0.00				1
8/15/19	Further discussion on retainer questions from EN and JHorn (0.50); executing retainer (0.10); discussing payment method and confirmation (0.10).	0.00	0.70	0.70	0.00				1

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RSN: Robert S. Notzon  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
8/23/19	Exchange emails with Client re response to phone message, next steps and preparation of Complaint.	0.20				0.20		0.20	1
8/23/19	Research on legal issues related to <b>Equal Pay Act</b> , pregnancy discrimination, gender discrimination and <b>disparate impact</b> discrimination (2.50, reduced to 2.00).	2.00	2.50	0.50	2.00				1
8/24/19	Review email(s) from: RSN re <b>disparate impact</b> research.	0.00				0.20	0.20	0.00	1
8/25/19	Legal research re <b>disparate impact</b> claims.	0.00				1.50	1.50	0.00	1
8/26/19	Discussion w/ RWS re <b>disparate impact</b> .	0.00	0.50	0.50	0.00				1
8/26/19	Continue legal research re <b>disparate impact</b> claims (2.30); discussion with RSN regarding <b>disparate impact</b> (0.50) (all reduced to 0.00).	0.00				2.80	2.80	0.00	1
8/28/19	Legal research re <b>disparate impact</b> theory.	0.00				1.40	1.40	0.00	1
9/3/19	Meet w/ RWS and EN re complaint draft ( <b>Doc. 1</b> ) (2.70 reduced to 2.00).	2.00	2.70	0.70	2.00				1
9/4/19	Review EN's documents and communications, organizing them into two categories: one to UT administration/representatives, one to department faculty/co-workers.	0.25	0.25		0.25				1
9/5/19	Phone conference(s) with Client and RSN re further revisions to complaint ( <b>Doc. 1</b> ), issues surrounding modified instructional duty, possible ongoing pregnancy discrimination and environment/relations with other faculty in department and Chair (1.20 reduced to 1.00).	1.00				1.20	0.20	1.00	1

1. Pre-Suit

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

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9. Trial

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11. Settlement

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/8/19	R&R and advising EN on EN's comparison versions of EN's complaints (Doc. 1).	0.50	0.50		0.50				1
9/9/19	Review, incorporate and respond to revisions, edits and questions from RSN, Client, and J Horn re complaint (Doc. 1) and finalize same, including draft emails to and review emails re same (3.50), phone conference with RSN, Client, and J Horn re same (1.00, reduced to .80).	4.30				4.50	0.20	4.30	1
9/9/19	Pregnancy discrimination complaint follow up research (0.75); more R&R and editing of the proposed complaint for EN (2.00, reduced to 1.50); R&R of EN's historical communications re: her complaints against UT for denial of tenure (1.50); discussion w/ RWS, EN re complaint draft (1.00, reduced to 0.75); R&R of the final draft of the Complaint (Doc. 1) (0.50).	5.00	5.75	0.75	5.00				1
	<b>Phase 1 Totals</b>	<b>118.20</b>	<b>49.60</b>	<b>16.65</b>	<b>32.95</b>	<b>97.00</b>	<b>11.75</b>	<b>85.25</b>	
8/25/19	Begin drafting Plaintiff's Original Complaint (Doc. 1), including review of Client's underlying source documents and emails relating to facts of case and tenure process/denial.	3.60				3.60		3.60	2
8/26/19	Continue reviewing Client documents and drafting complaint (Doc. 1), including drafting email to and reviewing email from Client re same and Client documents.	1.70				1.70		1.70	2
8/27/19	Continue review of Client documents, complete initial draft of Complaint and draft emails to Client and RSN re same (Doc. 1).	2.80				2.80		2.80	2

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RSN: Robert S. Notzon  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
8/27/19	R&R and editing of draft complaint from RWS (2.00, reduced to 1.50); return to RWS (Doc. 1).	1.50	2.00	0.50	1.50				2
8/28/19	Seek agreement from UT to accept service through UT's general counsel's office seeking agreement from UT to accept service through UT's general counsel's office (0.10); receive UT confirmation of agreement to accept service (0.10); edit subsequent draft complaint from RWS (3.00, reduced to 2.50).	2.70	3.20	0.50	2.70				2
8/28/19	Continue drafting, revising and editing complaint including review of comments and edits by RSN and draft emails to and review emails from RSN re same, (Doc. 1), phone conference with RSN re same and contacting UT attorney for waiver of service and review emails from RSN and UT counsel Jeff Graves re same.	1.10				1.10		1.10	2
8/29/19-1	Exchange emails with Client and RSN and phone conference with RSN re complaint (Doc. 1), legal strategies in case including disparate impact and pregnancy versus sex discrimination.	0.50				0.70	0.20	0.50	2
8/29/19-4	Continue drafting and review and editing of complaint (Doc. 1).	0.50				0.80	0.30	0.50	2
8/29/19-5	R&R of last edits by RWS and approval and discuss same with RWS (Doc. 1).	0.50	0.75	0.25	0.50				2
8/29/19-6	Communicate w/ UT Counsel re EN as the plaintiff that UT will accept service for.	0.10	0.10		0.10				2
8/29/19-7	Communicate w/ EN and JHorn re final draft of Complaint (Doc. 1).	0.25	0.25		0.25				2
8/29/19-8	Schedule meeting w/ RWS, EN about Complaint draft (Doc. 1).	0.00	0.10	0.10	0.00				2

1. Pre-Suit

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RSN: Robert S. Notzon

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/3/19	Office conference with EN, JHorn and RSN re filing case, draft complaint (Doc. 1), legal strategy, and facts of case (2.70, reduced to 2.00).	2.00				2.70	0.70	2.00	2
9/5/19	Continue drafting and revising complaint in response to Client edits and questions and draft emails to and review emails from Client and RSN re same, including review of parental leave policies and Client contract with UT (Doc. 1).	3.80				3.80		3.80	2
9/5/19	Confirm w/ EN that she has not made any additional changes to the complaint (Doc. 1) (0.10); R&R of latest complaint version from RWS for review, comment, and approval (0.75); discussion w/ EN and RWS re final draft of complaint and ongoing issues of possible discrimination at UT (1.20, reduced to 1.00); edit complaint based on discussion in meeting (0.50).	2.35	2.55	0.20	2.35				2
9/6/19	Review suggested edits to complaint (Doc. 1) from Client and JHorn, review and revise complaint, and draft email to Client, RSN, JHorn re same and reasoning for various changes.	1.60				1.60		1.60	2
9/10/19	R&R of filings initiating case (Docs. 1-3) (0.25); discussion w/ RWS and EN re case assignment and next steps (0.50); communications Jeff Graves (UT in house counsel) re UT accepting service (0.25); R&R of email confirmation of discussion re waiver of service by UT and answer calculation (0.10).	1.10	1.10		1.10				2
9/10/19	Exchange emails with UT attorney Sentz re courtesy copy of lawsuit and waiver of service (Docs. 1, 2).	0.30				0.30		0.30	2
9/11/19	R&R of Executed Waiver of service - filed (Doc. 3) (0.10, reduced to 0.00); communicate w/ OC on service method for litigation (via email) (0.10).	0.10	0.20	0.10	0.10				2

1. Pre-Suit

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RSN: Robert S. Notzon

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
11/8/19	R&R of UT's Answer (Doc. 9) and compare with Complaint for admission/denials (1.00, reduced to 0.50); discuss UT's answer w/ RWS and EN (Doc. 9) (0.50).	1.00	1.50	0.50	1.00				2
11/10/19	R&R of EN's notes re UT's Answer to the suit (Doc. 9).	1.25	1.50	0.25	1.25				2
6/26/20	R&R of RWS's draft amended complaint (Doc. 21).	0.00	0.10	0.10	0.00				2
6/26/20	Draft Plaintiff's First Amended Complaint (Doc. 21) (3.10), including review of source documents and emails and phone conference with Client re facts of case (0.30) and RSN re same (0.20); draft email to RSN re same (0.10).	0.00				3.70	3.70	0.00	2
6/27/20-1	Edit amended complaint (Doc. 21).	0.00	2.00	2.00	0.00				2
6/27/20-2	Review and incorporate edits and suggestions from RSN re First Amended Complaint and draft email to Client re same (Doc. 21).	0.00				1.00	1.00	0.00	2
6/29/20	R&R of EN's comments and suggestions re amended complaint (Doc. 21) (0.75); R&R of RWS's changes based upon EN's edits (0.50).	0.00	1.25	1.25	0.00				2
6/29/20	Review Client revisions to First Amended Complaint, supporting source emails and documents and revise and finalize complaint (Doc. 21).	0.00				1.30	1.30	0.00	2
6/30/20	R&R of draft request for leave to file amended complaint (Doc. 21).	0.00	0.10	0.10	0.00				2
6/30/20	Final review and edits to amended complaint (Doc. 21).	0.00	1.00	1.00	0.00				2

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RSN: Robert S. Notzon  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/30/20	Exchange emails with OC re filing amended complaint and UT's agreement or opposition (Doc. 21).	0.00				0.20	0.20	0.00	2
7/1/20	R&R of filed motion for leave to amend complaint (Doc. 21).	0.00	0.10	0.10	0.00				2
7/1/20	Draft email(s) to and review email(s) from: OC re no opposition to filing of amended complaint (Doc. 21) and possible extension of discovery deadlines.	0.10				0.10		0.10	2
7/2/20	Exchange emails with Client re filing of First Amended Complaint and Court's order accepting same (Doc. 21).	0.00				0.20	0.20	0.00	2
7/2/20	R&R of first amended complaint (Doc. 21) and text order granting motion for leave to file.	0.00	0.20	0.20	0.00				2
12/18/20	Phone conference(s) with RSN re discovery schedule/extension, Defendant's Answer to First Amended Complaint, and review same (Doc. 33).	0.50				1.00	0.50	0.50	2
12/18/20	R&R of UT's answer to amended complaint (Doc. 33) and discuss same w/ RWS, as well as discovery schedule and need for extension.	0.50	1.00	0.50	0.50				2
	<b>Phase 2 Totals</b>	<b>29.85</b>	<b>19.00</b>	<b>7.65</b>	<b>11.35</b>	<b>26.60</b>	<b>8.10</b>	<b>18.50</b>	
9/19/19	R&R of Court order for status conference on 9/25 (Doc. 4).	0.10	0.10		0.10				3
9/24/19	Confer w/ RWS and EN re: Judge being an adjunct professor and whether either party considers that an impediment to oversee this litigation.	0.25	0.50	0.25	0.25				3

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 14 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/24/19	Draft emails to Client and JHorn and RSN re status conference with Judge Pitman and possible conflict of interest as adjunct faculty at UT.	0.50				0.50		0.50	3
9/25/19	R&R of email continuing status conference to 10/8 and ask court for morning hearing on 10/8 due to RWS travel in the afternoon (Doc. 5).	0.00	0.10	0.10	0.00				3
9/25/19	Exchange emails with Court deputy re status conference with Judge Pitman regarding possible conflict of interest (0.20, reduced to 0.00); phone conference with Client and JHorn re same (0.30).	0.30				0.50	0.20	0.30	3
10/8/19	R&R of RWS's draft of parties' advisory re no conflict with Judge Pitman and UT's filing (Docs 6, 7) (0.10, reduced to 0.00); status conference with Judge Pitman (Doc. 8) (0.30); reporting to EN re the status conference (0.50).	0.80	0.90	0.10	0.80				3
10/8/19	Draft email(s) to and review email(s) from: RSN re Pitman assignment as judge. (0.10); draft waiver of conflict re Judge Pitman (Doc. 6) (0.20); attend status conference with Judge re conflict of interest (Doc. 8) (0.30) and phone conference with RSN re same (0.30).	0.90				0.90		0.90	3
10/14/19	R&R of opposing counsel's (BD's) vacation letter	0.10	0.10		0.10				3
1/10/20	R&R of Court order directing proposed scheduling order and Joint report and confer w/ RWS re the Court's recent order (Doc. 10).	0.20	0.20		0.20				3
1/10/20	Review Court order re need for pretrial scheduling order and draft email to and review email from RSN re same (Doc. 10).	0.20				0.20		0.20	3
1/13/20	R&R of BDower's email reaching out re recent Court Order (Doc. 10).	0.10	0.10		0.10				3

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 15 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
1/13/20	Exchange emails with OC re submission of proposed pretrial scheduling order (Doc. 11).	0.20				0.20		0.20	3
1/14/20	Discuss scheduling options for litigation w/ RWS (Doc. 11).	0.25	0.25		0.25				3
1/14/20	Phone conference(s) with Client and JHorn (0.60), RSN (0.25) and OC (0.40) re proposed pretrial schedule and trial date and draft emails to and review emails from Client, JHorn, RSN and OC re same (0.40) (Doc. 11).	1.65				1.65		1.65	3
1/15/20	Draft proposed pretrial scheduling order (0.30) and draft emails to and review emails from OC and RSN re same (0.20) and phone conference with RSN (0.60) re same (Doc. 11).	1.30				1.30		1.30	3
1/15/20	Confer w/ RWS re potential scheduling dates and proposed scheduling order w/ RWS and with UT (Doc. 11).	0.60	0.60		0.60				3
1/16/20	R&R of filed proposed scheduling order (Doc. 11).	0.10	0.10		0.10				3
1/24/20	R&R of Court's order for pretrial scheduling hearing on 2/3 and email from BDower re same (Doc. 12).	0.10	0.10		0.10				3
1/24/20	Review email(s) from OC re confirmation of proposed trial date, protective order and other pretrial conference matters.	0.10				0.10		0.10	3
1/28/20	Discussion w/ RWS re issues that might come up during call with UT on 1/30 since RSN will not be able to participate.	0.50	0.50		0.50				3
1/28/20	Exchange emails with OC and RSN re scheduling phone conference before	0.50				0.70	0.20	0.50	3

1. Pre-Suit  
2. Pleadings  
3. Rule 16 Case Mgmt.

4. Discovery  
5. Blank  
6. MTD (Doc. 22)

7. MSJ  
8.1 Trial Prep  
8.2 Focus Group

9. Trial  
10.1 Post Trial  
10.2 Fees & Costs

11. Settlement  
12. Workplace Issues

RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 16 of 153**



Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	pretrial scheduling conference (0.20, reduced to 0.00); phone conference with RSN regarding rule 26(f) conference with OC, status conference and possible discovery/trial dates and issues (0.50).								
1/30/20	Exchange emails with OC re protective order and pretrial scheduling conference.	0.20				0.20		0.20	3
1/30/20	Review emails between RWS and UT re agreement to entry of protective order (0.10 reduced to 0.00).	0.00	0.10	0.10	0.00				3
1/31/20	Exchange emails with Court deputy and OC re initial pretrial conference and proposed trial date.	0.10				0.10		0.10	3
1/31/20	R&R the call in information for 2/3 at 2pm (0.10, reduced to 0.00); reach out to UT re any discussion prior to initial pretrial hearing (0.10).	0.10	0.20	0.10	0.10				3
2/3/20	Initial pretrial hearing (Doc. 14) (0.40); R&R of entry of the scheduling order (Doc. 15) (0.10); file non-consent to Magistrate (Doc. 13) (0.10, reduced to 0.00); R&R of UT's non-consent (Doc. 16) (0.10); discuss w/ EN re scheduling order (Doc. 15) and next steps (0.50).	1.10	1.20	0.10	1.10				3
2/3/20	Draft notice declining magistrate and email to RSN re same (Doc. 13).	0.20				0.20		0.20	3
3/25/20	R&R of Court order (Doc. 17) on Pandemic.	0.00	0.10	0.10	0.00				3
3/25/20	Review documents: Court order re Covid-19 (Doc. 17).	0.10				0.10		0.10	3
4/17/20	R&R of Court's Order amending pandemic order (Doc. 18).	0.10	0.10		0.10				3

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 17 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/23/20	R&R of Court order on the Pandemic (Doc. 19).	0.10	0.10		0.10				3
6/24/20	Update EN re Court order on pandemic (Doc. 19).	0.10	0.10		0.10				3
7/15/20-1	R&R emails w/ BDower on proposed dates for changing the scheduling order (0.10); R&R of notice of appearance of Amy Hilton (Doc. 23) (0.10, reduced to 0.00).	0.10	0.20	0.10	0.10				3
7/15/20-2	Exchange emails with OC re proposed extension of deadlines for discovery responses and other case deadlines.	0.20				0.20		0.20	3
7/17/20	Respond to EN's questions re previous scheduling order changes and specific dates of concern to her future plans and what she needed to make sure she was available for and in what capacities.	0.25	0.25		0.25				3
9/24/20	Exchange emails with Client, RSN and OC re document production, probationary extensions, pretrial deadlines and possibly moving trial date to allow time for discovery and experts.	1.80				1.80		1.80	3
9/24/20	Discuss w/ RWS schedule change on all deadlines including trial.	0.75	0.75		0.75				3
9/26/20	Exchange emails with RSN re discovery, expert schedule and meeting present trial date.	0.30				0.30		0.30	3
9/26/20	Continued discussion w/ RWS re possible trial date schedule change.	0.20	0.20		0.20				3

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 18 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/29/20	Exchange emails with OC and Courtroom Deputy re 10/1/20 status conference with Judge Pitman (Doc. 26).	0.20				0.20		0.20	3
10/1/20	Status conference call w/ court (Doc. 26).	0.30	0.30		0.30				3
10/1/20	Attend hearing and represent Client: Status conference with Judge re dispositive motion deadline and discovery to be completed (0.30) and draft email to and review email from Client re same (0.30); phone conference(s) with RSN re status conference with Court, amended scheduling order and outline of discovery schedule, and phone conference with OC re same (0.70); phone conference(s) with OC re revised scheduling order and discovery issues (0.20).	0.80				0.80		0.80	3
11/17/20	Confer w/ RWS and EN re fall back positions on trial settings if the Court's schedule doesn't accommodate EN's preferences.	0.50	0.50		0.50				3
11/18/20	Phone conference(s) with RSN re moving trial date and discovery/document production and deposition schedule and draft emails to and review emails from RSN re same (0.40); phone conference(s) with OC re request for trial continuance and new pretrial deadlines due to discovery and legal issues and review emails from and draft emails to OC and Court deputy re same (0.90).	1.30				1.30		1.30	3
11/18/20	R&R Court order setting status hearing tomorrow (Doc. 29).	0.00	0.10	0.10	0.00				3
11/19/20	Discuss potential dates for new scheduling order w/ RWS (0.50); participate in status hearing (Doc. 30) (0.30); R&R of new scheduling order (Doc. 31) (0.10).	0.90	0.90		0.90				3

1. Pre-Suit  
2. Pleadings  
3. Rule 16 Case Mgmt.

4. Discovery  
5. Blank  
6. MTD (Doc. 22)

7. MSJ  
8.1 Trial Prep  
8.2 Focus Group

9. Trial  
10.1 Post Trial  
10.2 Fees & Costs

11. Settlement  
12. Workplace Issues

RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 19 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
11/19/20	Attend hearing and represent Client at status and scheduling conference re new proposed trial schedule (0.30) (Doc. 30); phone conference(s) with RSN re new discovery and pretrial deadlines and exchange emails re same and deposition date for SWood and GFenves (1.20); phone conference(s) OC and RSN re amended pretrial deadlines and possible deposition dates and draft emails to and review emails from OC re same (0.40).	1.90				1.90		1.90	3
11/23/20	Draft email(s) to and review email(s) from: OC and Clients re case deadlines.	0.10				0.10		0.10	3
8/1/21	Phone conference(s) with OC re request to extend dispositive motion deadline (Doc. 36).	0.10				0.10		0.10	3
8/3/21	Draft emails to and review emails from OC and RSN re extension of dispositive motions deadline and Client's request for leave (Doc. 36).	0.30				0.30		0.30	3
8/3/21	Work out a requested extension of MSJ and response deadlines with BDower (Doc. 36).	0.25	0.25		0.25				3
8/22/21	Work out with BDower another request for MSJ and response extensions (Doc. 36).	0.25	0.25		0.25				3
8/23/21	Agree with BDower to extension of MSJ and response deadline (Doc. 36).	0.10	0.10		0.10				3
8/24/21	R&R motion for extension of MSJ deadlines (Doc. 36).	0.10	0.10		0.10				3
10/4/21	R&R of NOA of Gibson for UT (Doc. 40).	0.10	0.10		0.10				3
10/6/21	Send out vacation notice for late Nov (20-29).	0.00	0.10	0.10	0.00				3

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 20 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/8/21	Exchange emails to RSN re requesting extension of time to file MSJ response and review motion with suggested edits (Doc. 41).	0.30				0.30		0.30	3
10/8/21	Communications with RWS and UT re MFExtension for MSJ response (Doc. 41) (0.20, reduced to 0.00); draft same (0.25); suggested edits to reasons for changes to MSJ response (0.50).	0.75	0.95	0.20	0.75				3
10/12/21	Review Order of court extending time to respond to MSJ.	0.00				0.10	0.10	0.00	3
10/12/21	R&R of Court order granting extension to 10/20 to file MSJ response.	0.00	0.10	0.10	0.00				3
10/21/21	R&R court order resetting trial to 3/7/22 (Doc. 43).	0.10	0.10		0.10				3
10/22/21	Confer w/ RWS about new trial setting.	0.25	0.25		0.25				3
10/26/21	Agree with UT re extension to reply (0.10); R&R of UT's motion to extend reply deadline (Doc. 45) (0.10).	0.20	0.20		0.20				3
10/26/21	Phone conference(s) with Client re trial resetting and D's MSJ.	0.10				0.10		0.10	3
10/27/21	R&R of court order granting UT extension to Nov 5 for reply.	0.10	0.10		0.10				3
10/31/21	Agree with UT for another extension to file reply to MSJ (Doc. 46).	0.10	0.10		0.10				3
11/1/21	Exchange emails with OC and RSN re extension of time to file reply re MSJ (Doc. 46).	0.10				0.10		0.10	3
11/1/21	R&R of UT's motion for another extension to file reply (Doc. 46).	0.10	0.10		0.10				3

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 21 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
11/2/21	R&R of Court Order granting UT extension to 11/12 to file reply.	0.10	0.10		0.10				3
11/15/21	R&R of RWS vacation notice (Doc. 48).	0.00	0.10	0.10	0.00				3
11/15/21	Draft vacation notice (Doc. 48).	0.00				0.10	0.10	0.00	3
11/18/21	Exchange emails with OC re motion to extend time to file response to motion to exclude PGlick (Doc. 52), and motion for leave to file sur-reply (Doc. 50).	0.20				0.20		0.20	3
11/19/21	R&R of efforts to obtain extension of time to file response to motion to exclude PGlick.	0.00	0.10	0.10	0.00				3
11/19/21	Exchange emails and confer by phone with OC re extension of time to file response to D's motion to exclude PGlick (Doc. 52).	0.30				0.30		0.30	3
11/21/21-3	Draft motion to extend response deadline (Doc. 52).	0.50	0.50		0.50				3
11/21/21-2	Exchange emails with OC re motion to extend time to respond to D's motion to exclude PGlick (Doc. 52).	0.30				0.30		0.30	3
11/22/21-2	R&R of MFExtension (Doc. 52).	0.00	0.10	0.10	0.00				3
11/22/21-1	Review and edit motion to extend response to UT's motion to exclude PGlick and proposed order (Doc. 52).	0.00				0.30	0.30	0.00	3

1. Pre-Suit  
2. Pleadings  
3. Rule 16 Case Mgmt.

4. Discovery  
5. Blank  
6. MTD (Doc. 22)

7. MSJ  
8.1 Trial Prep  
8.2 Focus Group

9. Trial  
10.1 Post Trial  
10.2 Fees & Costs

11. Settlement  
12. Workplace Issues

RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 22 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
11/23/21-2	R&R of Court text order granting extension to 12/14 for response to motion to exclude.	0.10	0.10		0.10				3
11/23/21-1	Review court order granting extension of time to reply to motion to exclude PGlick.	0.10				0.10		0.10	3
12/20/21	Review referral of motion to exclude to magistrate.	0.00				0.10	0.10	0.00	3
12/20/21	R&R of text order referring to Mag UT's MTExclude.	0.00	0.10	0.10	0.00				3
1/27/22	R&R of court order setting pretrial conference earlier than expected - 2/16/22 (Doc. 55).	0.10	0.10		0.10				3
1/27/22	Review Court Order (Doc. 55) regarding final pretrial conference setting, review local rules re impact on pretrial deadlines and draft emails to and review emails from RSN re same.	0.40				0.40		0.40	3
2/1/22	R&R Court Order resetting time for pretrial hearing (Doc. 56).	0.10	0.10		0.10				3
2/9/22	R&R of Court order resetting final pretrial hearing for earlier on 2/16 (Doc. 59).	0.10	0.10		0.10				3
2/15/22	Confer w/ RWS re issues to cover and resolve for hearing tomorrow.	0.80	0.80		0.80				3
2/16/22	R&R of RWS's draft responses to UT's objections to EN's exhibits (to be argued at pretrial hearing).	0.50	0.50		0.50				3
2/16/22	Pretrial hearing w/ RWS, UT and Court (Doc. 67) (0.90); confer with RWS re same (0.25); notify EN, witnesses, and experts of possible change in trial setting	1.65	1.65		1.65				3

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 23 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	as learned in pretrial hearing due to Court's criminal setting (0.50).								
2/18/22	Working w/ UT and RWS re potential future trial settings if needed.	0.50	0.50		0.50				3
2/21/22	R&R of court reporter notice of transcript of pretrial hearing	0.00	0.10	0.10	0.00				3
2/25/22	Court confirms 3/7 setting is going forward for our case (0.10), and relay same to EN and all witnesses, experts re setting and proposed schedules (0.50).	0.60	0.60		0.60				3
3/2/22	R&R of UT's objection re vaccination policy and discussion w/ RWS (Doc. 75).	0.50	0.50		0.50				3
3/16/22	Phone conference with OC re post trial schedule (0.20) and with RSN re same (0.20).	0.40				0.40		0.40	3
3/18/22	R&R of court order for hearing on post trial schedule (Doc. 97).	0.10	0.10		0.10				3
3/21/22	Phone conference(s) with RSN re post-trial scheduling conference tomorrow with judge and briefing schedule for front pay, attorneys fees (Doc. 97).	0.50				0.50		0.50	3
3/21/22	Confer w/ RWS re issues to cover in hearing tomorrow (Doc. 97).	0.50	0.50		0.50				3
3/22/22	Phone conference(s) with RSN re post-trial scheduling conference and briefing on damages (Doc. 97).	0.20				0.20		0.20	3
3/22/22	Attend hearing and represent Client re post-trial schedule for briefing on damages and attorneys fees (Doc. 97).	0.20				0.20		0.20	3
3/22/22	Phone conference(s) with OC re scheduling conference with Judge Pitman.	0.10				0.10		0.10	3

1. Pre-Suit  
2. Pleadings  
3. Rule 16 Case Mgmt.

4. Discovery  
5. Blank  
6. MTD (Doc. 22)

7. MSJ  
8.1 Trial Prep  
8.2 Focus Group

9. Trial  
10.1 Post Trial  
10.2 Fees & Costs

11. Settlement  
12. Workplace Issues

RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 24 of 153**



Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	(Doc. 97).								
3/22/22	Attend post trial hearing (Doc. 97).	0.20	0.20		0.20				3
3/23/22	Discuss w/ RWS re post trial scheduling.	0.25	0.25		0.25				3
3/23/22	Exchange emails with RSN re post-trial schedule.	0.10				0.10		0.10	3
3/30/22	R&R of RWS's proposed post trial schedule.	0.10	0.10		0.10				3
5/4/22	Confer with opposing counsel and RWS re extension for UT to respond to motion.	0.10	0.10		0.10				3
5/6/22	R&R of UT's motion for extension.	0.10	0.10		0.10				3
5/9/22	R&R of Court's granting UT's motion.	0.10	0.10		0.10				3
6/7/22	Exchange emails with re extension of time to file response to motion for judgment (Doc. 101).	0.10				0.10		0.10	3
6/10/22	Review documents Court text order granting extension to file response to motion for judgment.	0.10				0.10		0.10	3
6/24/22	Draft unopposed motion for extension to reply (Doc. 103).	0.20				0.20		0.20	3
6/25/22	R&R of our motion for extension to reply.	0.10	0.10		0.10				3
6/27/22	R&R of court order granting motion for extension.	0.10	0.10		0.10				3

1. Pre-Suit  
2. Pleadings  
3. Rule 16 Case Mgmt.

4. Discovery  
5. Blank  
6. MTD (Doc. 22)

7. MSJ  
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9. Trial  
10.1 Post Trial  
10.2 Fees & Costs

11. Settlement  
12. Workplace Issues

RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 25 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	<b>Phase 3 Totals</b>	<b>34.15</b>	<b>19.15</b>	<b>1.95</b>	<b>17.20</b>	<b>17.95</b>	<b>1.00</b>	<b>16.95</b>	
9/16/19	R&R of public statement by UT on its commitment to ethics as potential evidence of pretext/contradiction between professions and actions by UT (0.25); R&R of email from EN on sick leave plans by EN (0.50, reduced to 0.20).	0.45	0.75	0.30	0.45				4
9/18/19	Review emails from Client re appointment of Christine Julien as Dean of Diversity and Inclusion and history of interactions between Client and Julian and birth of 3rd child.	0.30				0.30		0.30	4
9/18/19	R&R of announcement of CJulien's appointment as Asst. Dean for DEI and discussion w/ EN on relevance to the case.	0.50	0.50		0.50				4
9/20/19	Respond to EN and RWS re CJulien appointment as Asst. Dean for DEI.	0.10	0.10		0.10				4
10/9/19	R&R of additional docs uploaded to Dropbox folder by EN to support the case.	4.00	5.00	1.00	4.00				4
10/10/19	R&R of additional docs from EN.	4.00	5.00	1.00	4.00				4
10/25/19	Discuss w/ RWS and EN re: delays in the Dean's review committee	0.25	0.25		0.25				4
11/14/19	Confer with EN re another faculty member at ECE with issues for potential assistance in this case as well as his own case.	0.25	0.25		0.25				4
11/15/19	Review response from other faculty member to my email inquiry.	0.10	0.10		0.10				4
12/9/19	Draft email to EN and RSN re next steps in lawsuit and things EN can do to assist.	0.50				0.50		0.50	4

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12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
12/10/19	Confer w/ RWS and EN re our advice to EN on next steps and best course of action moving forward.	0.50	0.50		0.50				4
1/28/20	R&R of EN's 1099s and other docs for initial disclosures.	1.00	1.50	0.50	1.00				4
1/31/20	R&R of UT's production 24954-25569, 25570-26194, and 26195-26509.	4.00	4.00		4.00				4
2/3/20	Discuss w/ EN the discovery process, her duty to produce responsive information and what if any information she has that she would want to protect from public access/disclosure.	0.25	0.25		0.25				4
2/15/20	Review email(s) from Client and RSN re promotion of Alex Dimakis to full professor.	0.10				0.10		0.10	4
2/15/20	Confer w/ RWS and EN re the promotions of ADimakis.	0.20	0.20		0.20				4
2/18/20	Phone conferences with RSN re potential experts re pregnancy discrimination (0.50), and re statistical evidence (0.50).	1.00				1.00		1.00	4
2/18/20	Confer w/ RWS re potential experts re pregnancy discrimination	0.50	0.50		0.50				4
2/21/20	Confer w/ RSN re <b>disparate impact</b> claim	0.00				0.50	0.50	0.00	4
2/21/20	Confer w/ RWS re <b>disparate impact</b> claim.	0.00	0.50	0.50	0.00				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/23/20	Research on <b>gender neutral</b> parental leave policies in academia as a means of learning issues and potentially identifying an expert witness (1.50, reduced to 0.00); review documents for details re other comparable faculty members re whether the documents provide potential relevant evidence to EN's case (0.50).	0.50	2.00	1.50	0.50				4
2/24/20	Review email(s) from: Client re <b>gender neutral</b> parental leave policies at universities and study re same.	0.00				0.20	0.20	0.00	4
2/26/20	R&R of EN's report re comparator issues in ECE and requesting a meeting with attorneys.	0.75	0.75		0.75				4
2/28/20	Review email from and draft email to Client re Assist Prof J Zoldan denial of tenure by Dean SWood (0.40); exchange emails with Client and RSN re scheduling of in-person meeting (0.30, reduced to 0.00).	0.40				0.70	0.30	0.40	4
3/5/20	Review, for potential use in the case, new research on family friendly policy that shows data indicating the policy is actually friendliest to male professors (0.50); discussion of case w/ EN and RWS at RWS office (1.50).	2.00	2.00		2.00				4
3/5/20	Review emails with Client and case documents and draft emails to and review emails from OC re Rule 26(f) pretrial conference and documents to preserve and locate and anticipated depositions (0.40); in-person conference: with Client, JHorn and RSN re case facts, themes, strategy and litigation schedule and what to expect (1.50); conference with EN re same (0.60).	2.50				2.50		2.50	4
3/9/20	Phone conference(s) with OC per Rule 26(f) re pretrial schedule and discovery issues.	0.50				0.50		0.50	4

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RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/9/20	Rule 26(f) conference call w/ UT and RWS.	0.50	0.50		0.50				4
3/12/20	Review email(s) from Client and RN re Client emails for production to UT.	0.20				0.20		0.20	4
3/12/20	R&R of EN's emails in her tenure folder for review to produce in discovery.	4.00	5.00	1.00	4.00				4
3/13/20	R&R of EN's emails in her tenure folder for review to produce in discovery.	3.50	4.00	0.50	3.50				4
3/26/20	Discussion w/ RWS and EN on move of UT Provost McInnis away from UT.	0.25	0.25		0.25				4
3/27/20	Exchange emails with OC re receipt of UT's initial disclosures and extension of P's initial disclosures.	0.30				0.30		0.30	4
3/28/20	R&R of UT's initial production (pages 1-816).	2.50	3.00	0.50	2.50				4
3/28/20	R&R of UT's initial disclosures (0.50 reduced to 0.30).	0.30	0.50	0.20	0.30				4
3/30/20	Review email(s) from RSN and OC re documents produced by UT (0.10 reduced to 0.00); draft email(s) to and review email(s) from: Client and RSN re Client searching for and producing emails and documents relevant to case. (0.30).	0.30				0.40	0.10	0.30	4
3/30/20	Communicate with UT re: form of produced emails for the litigation (0.10, reduced to 0.00); R&R of UT's initial production (pages 1-816) (2.00, reduced to 1.75); review notice from EN re texts in preparation for production (0.10).	1.85	2.20	0.35	1.85				4
3/31/20	R&R of EN texts for production.	1.50	2.00	0.50	1.50				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
4/2/20	Confer w/ RWS and EN re organizing and tracking requests, our production, and receipt of UT's production	0.20	0.20		0.20				4
4/6/20	Review email from Client re gender neutral childbirth leave policies and disparate impact.	0.00				0.20	0.20	0.00	4
4/6/20	Review email from Client re gender neutral childbirth leave policies and disparate impact.	0.00	0.50	0.50	0.00				4
4/7/20	Exchange emails with Client and RSN re gender neutral policies, resignation of UT President GFenves, expert report re student evaluation scores, and review of case documents (0.40, reduced to 0.20); review documents produced by UT and Client and make notes concerning same and identify important documents for future reference (2.90).	3.10				3.30	0.20	3.10	4
4/8/20	Continue review documents produced by UT and Client and make notes concerning same and identify important documents for future reference.	1.40				1.40		1.40	4
4/9/20	Phone conference(s) with Client re provost's meeting re tenure procedures, review and production of case documents, and gender neutral childbirth leave policies (0.60, reduced to 0.40); continue review of UT and Client documents, make notes re same and identify important documents for future use (1.80); legal research: re gender neutral child birth policies at universities, disparate impact claims and standards for same, and draft email to Client re same (1.20, reduced to 0.00).	2.20				3.60	1.40	2.20	4
4/10/20	R&R of EN's draft discovery requests to send to UT	1.00	1.50	0.50	1.00				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
4/13/20	R&R of MIT report on discrimination of women faculty.	0.50	0.50		0.50				4
4/13/20	R&R and edit of EN's updated draft discovery requests to send to UT.	0.50	0.50		0.50				4
4/13/20	Legal research re <b>gender neutral</b> university leave and child birth tenure extension study and draft emails to and review emails from Client re same (0.60, reduced to 0.00); exchange emails with Client re confidentiality/privilege of emails with JHorn (0.30); exchange emails with Client re potential documents to request from UT (0.20).	0.50				1.10	0.60	0.50	4
4/14/20	Draft Plaintiff's initial disclosures and draft email to and review email from Client re potential witnesses on emotional distress.	1.60				1.60		1.60	4
4/14/20	R&R and comment/edit of our initial disclosures draft before sending.	0.50	0.75	0.25	0.50				4
4/15/20	Exchange emails with Client and RSN re potential witnesses and knowledge of facts, including Client's emotional distress, and contacting potential witnesses re being identified as such in lawsuit.	0.80				1.10	0.30	0.80	4
4/15/20	Confer w/ RWS and EN regarding potential witnesses for suit and protecting students and faculty from potential discrimination and/or retaliation from UT.	0.50	0.50		0.50				4
4/16/20	Draft email(s) to and review email(s) from: Client and RSN re additional potential witnesses including students and professors who might be supportive.	0.30				0.30		0.30	4
4/16/20	Document, for later use, EN's identification of students that she believes supported her tenure (0.25); confer w/ JHorn and EN re: their separating JHorn and EN emails from other emails for privilege purposes (0.50).	0.75	0.75		0.75				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
4/17/20	R&R of email communications between EN and other faculty who may be called as potential witnesses (0.50); R&R of further lists of students provided by EN that had been supportive of EN (0.25).	0.75	0.75		0.75				4
4/17/20	Exchange emails with Client and RSN re potential witnesses and possible ways to communicate with same (0.50), and phone conference with Client re same (0.40).	0.90				0.90		0.90	4
4/20/20	Conference call w/ RWS, JHorn and EN re: student and faculty support and feedback and how to approach and manage it and additional case facts and themes (1.70, reduced to 1.20); post-call follow up clarifying several issues for EN including strategy and approach to proving up the case (0.50 reduced to 0.00) .	1.20	2.20	1.00	1.20				4
4/20/20	Phone conference(s) with RSN, Client and JHorn re potential witnesses, details and facts of the case, and case strategy/themes (1.70, reduced to 1.20) and review emails from Client and JHorn re same (0.50).	1.70				2.20	0.50	1.70	4
4/22/20	Review email(s) from Client re “layperson” description of her academic research.	0.30				0.30		0.30	4
4/24/20	Exchange emails with Client and RSN re speaking with potential witnesses and asking for permission to list as possible witnesses or person with knowledge.	0.50				0.50		0.50	4
5/1/20-1	Finalize Plaintiff's initial disclosures, including review of all possible witnesses identified by Client, documents provided by Client, and draft email to Client and RSN re same and documents to be produced as part of disclosures.	2.20				2.20		2.20	4

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RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
5/1/20-2	R&R of initial disclosures from RWS.	0.75	1.25	0.50	0.75				4
5/2/20	R&R of EN's edits to our disclosures.	0.25	0.25		0.25				4
5/4/20	Finalize plaintiff's initial disclosures and draft email to OC re same.	0.30				0.30		0.30	4
5/4/20	R&R of final initial disclosures.	0.25	0.25		0.25				4
5/5/20	Review and correct initial disclosures by adding certificate of service and draft email to OC re same.	0.30				0.30		0.30	4
5/5/20	R&R of corrected version of initial disclosures.	0.00	0.10	0.10	0.00				4
5/6/20	Review EN documents and emails re case facts, tenure procedures and key witnesses, and draft plaintiff's first set of interrogatories in light of case facts, and draft email to RSN re same.	4.40				4.40		4.40	4
5/7/20-1	Exchange emails with RSN re Plaintiff's interrogatories to UT and revisions to same.	0.20				0.20		0.20	4
5/7/20-2	R&R of draft discovery requests prepared by RWS and edits for additional requests and modifications.	1.75	2.00	0.25	1.75				4
5/7/20-5	Discuss w/ RWS and EN re communication to EN and how to approach it and follow up.	0.20	0.20		0.20				4
5/8/20	Provide comments and suggestions to RWS re draft discovery requests and edits.	0.50	0.50		0.50				4

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
5/8/20	Review comments, suggestions and edits from RSN re interrogatories and revise and incorporate same and draft email to RSN re same and possible spam email to Client "from Dean Wood."	1.30				1.30		1.30	4
5/11/20	R&R of EN uploads to the Dropbox folder of 50 files (2.00, reduced to 1.50); additional drafting and editing of discovery requests to UT (1.50).	3.00	3.50	0.50	3.00				4
5/11/20	Exchange emails with RSN re draft interrogatories and suggested changes, edits (0.30); begin drafting RFPs to UT including review of Client and case documents (2.60).	2.90				2.90		2.90	4
5/14/20	Continue reviewing case/client documents including review of emails and source documents re facts of case (e.g. role of "President's Committee" and members, tenure process at dept and college level and key persons involved), drafting and tailoring requests for production and revising interrogatories accordingly (4.20), and phone conference with Client and JHorn re same (0.40) and draft emails to and review emails from RSN and Client re same (0.50).	5.10				5.10		5.10	4
5/14/20	R&R and edits (substantial additions/modifications to the draft) to RWS's newest draft discovery requests to UT and emails re same.	2.50	3.00	0.50	2.50				4
5/14/20	Seek call w/ EN to discuss discovery request issues and clarifications.	0.00	0.10	0.10	0.00				4

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
5/18/20	Continue work on Plaintiff's interrogatories and requests for production of documents, including review emails/edits from RSN, Client and JHorn, and source documents re facts of case (e.g. role of CJulien in tenure and review process, promotion to dean of diversity; history and conflict with department chair ATewfik; role of Sanjay Shakkottai in tenure review, etc.) and tailoring discovery requests accordingly; draft emails to and review emails from RSN, Client and JHorn, re same and responding to suggestions, comments and questions.	5.50				5.50		5.50	4
5/18/20	R&R of EN emails with CJulien and ATewfik re negative teaching evals and threats to tenure case uploaded to the Dropbox.	2.50	3.00	0.50	2.50				4
5/19/20	Confer w/ RWS regarding discovery requests and suggested edits (0.20); R&R of EN's comments and suggestions and providing input on our discovery requests and the import of the issues within the teaching evaluations (0.75); R&R of propounded discovery requests (0.25).	1.20	1.20		1.20				4
5/19/20	Finalize Plaintiff's interrogatories and requests for production of documents, including drafting emails to and review emails and source documents from RSN, Client and JHorn re facts of case and tailoring discovery requests accordingly, reviewing, incorporating and responding to suggestions from RSN, Client and JHorn (4.30), and phone conferences with RSN (0.20) and Client (0.20) re same.	4.70				4.70		4.70	4
5/19/20	Discuss with EN for clarification of facts associated with the CJulien and ATewfik emails uploaded yesterday.	0.50	0.50		0.50				4
5/20/20	Discuss/explain discovery process and timing to EN.	0.25	0.25		0.25				4

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
5/20/20	Review Client documents for production/disclosures to UT (4.50); draft email(s) to and review email(s) from: Client and RSN re discovery requests to UT and potential documents/timing of receipt (0.20).	4.70				4.70		4.70	4
5/28/20	Get additional updates from EN re women in ECE with children and emails uploaded to Dropbox for production.	0.50	0.50		0.50				4
5/28/20	Review email(s) from Client and RSN re women in ECE with children and pregnancy discrimination issues in ECE.	0.00				0.30	0.30	0.00	4
6/8/20	Review studies re discrimination in STEM and gender neutral childbirth policies, reach out to potential experts re same, and review email from Client re same (3.80 reduced to 3.00); exchange emails with RSN re experts and possible Equal Pay Act claim (0.20, reduced to 0.00).	3.00				4.00	1.00	3.00	4
6/8/20	Equal Pay Act claim research.	0.00	1.50	1.50	0.00				4
6/8/20	Confer w/ RWS re adding Equal Pay Act claim.	0.00	0.20	0.20	0.00				4
6/10/20	Confer w/ RWS re UT's request for extension of deadline to respond to discovery and proposed extension of our deadline to designate experts.	0.00	0.10	0.10	0.00				4
6/10/20	Exchange emails with OC and RSN re UT request for extension of response to written discovery and request for extension of expert deadline (0.30); search for expert witnesses regarding gender neutral childbirth policies (0.30, reduced to 0.00).	0.30				0.60	0.30	0.30	4

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/11/20	Exchange emails with RSN re search for possible expert witnesses (0.30); research re <b>gender neutral</b> childbirth policies at universities (0.70, reduced to 0.00) and gender discrimination in STEM (0.60).	0.90				1.60	0.70	0.90	4
6/11/20	Confer w/ RWS re potential expert topics and contacting potential experts.	0.30	0.30		0.30				4
6/13/20	Contact TGlass for economic damages and report to RWS and EN.	0.50	0.50		0.50				4
6/16/20	Legal research re <b>disparate impact</b> .	0.00	1.50	1.50	0.00				4
6/16/20	Phone conference(s) with RSN re status of case and anticipated discovery, extension on response to discovery for UT, search for expert witnesses including on student evaluations, UT diversity initiatives and use as possible exhibit/evidence, and ongoing treatment at UT (0.60) and draft email to Client re same (1.00).	1.60				1.60		1.60	4
6/16/20	Confer w/ RWS re potential expert witnesses and discovery issues (0.60); contact vocational expert (0.10, reduced to 0.00).	0.60	0.70	0.10	0.60				4
6/16/20	Research re <b>gender neutral</b> childbirth policies at universities, <b>disparate impact</b> claims, evidence and experts (5.20) and phone conference with scholar who performed study re same (1.00).	0.00				6.20	6.20	0.00	4
6/16/20	Legal research re tenure as a potential damage award from the court.	1.00	1.00		1.00				4
6/17/20	Legal research re possible court ordered remedies available in denial of tenure case.	1.70				1.70		1.70	4

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/18/20	Legal research re <b>disparate impact</b> claims, statistical evidence necessary, and possible expert witness.	0.00				1.80	1.80	0.00	4
6/18/20	Phone conference(s) with Client re ongoing employment issues, Client's mental health, and UT diversity and inclusion claims (0.90).	0.90				0.90		0.90	4
6/18/20	R&R of RWS's questions to EN re faculty evaluation.	0.00	0.10	0.10	0.00				4
6/19/20	Contact potential economic expert for EN.	0.10	0.10		0.10				4
6/19/20	Conference call w/ RWS re expert witnesses on damages and <b>disparate impact</b> (0.40 reduced to 0.20).	0.20	0.40	0.20	0.20				4
6/19/20	Confer w/ expert re identifying an economic expert for EN.	0.25	0.25		0.25				4
6/19/20	Phone conference(s) with RSN re need for expert witnesses on damages and statistical evidence re tenure cases at UT (0.40, reduced to 0.20).	0.20				0.40	0.20	0.20	4
6/19/20	R&R of UT's recent statement on DEI (0.20) and confer w/ EN and RWS (0.40 reduced to 0.20).	0.40	0.60	0.20	0.40				4
6/22/20-1	Review email from Client re diversity initiatives at UT school of engineering, possible use at trial, possible experts and ongoing work/issues at UT.	0.30				0.30		0.30	4
6/22/20-2	R&R of EN's responses to RWS's questions and discussion w/ RWS	0.10	0.50	0.40	0.10				4
6/24/20	Confer w/ RWS re what each of us learned with our independent research on <b>disparate impact</b> .	0.00	0.30	0.30	0.00				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/24/20	Legal research re <b>disparate impact</b> claims (2.20); phone conference with RSN re same (0.30).	0.00				2.50	2.50	0.00	4
6/24/20	Legal research re <b>disparate impact</b> claims and expert testimony required/allowed/restricted.	0.00	2.50	2.50	0.00				4
6/25/20	Legal research re <b>disparate impact</b> claims and need for expert witness (2.10), phone conference with RSN re same (0.20).	0.00				2.30	2.30	0.00	4
6/25/20	R&R of EN's uploaded docs re peer evaluations	0.50	0.50		0.50				4
6/25/20	R&R of the CIS scores for faculty (including EN) for comparison.	1.00	1.50	0.50	1.00				4
7/6/20	R&R of new eval docs EN uploaded to Dropbox.	0.50	0.50		0.50				4
7/9/20	Advise EN re communicating with a potential witness about the case.	0.20	0.20		0.20				4
7/9/20	Phone conference with OC re extension of response deadline to Plaintiff's discovery requests and pretrial deadlines generally (0.20); draft email(s) to and review email(s) from: Client and RSN re diversity panel in which Dean Wood will appear and speak and potential evidence re same (0.30).	0.50				0.50		0.50	4
7/10/20	Review and respond to multiple emails re discovery extensions.	0.25	0.25		0.25				4
7/10/20	Exchange emails with OC and RSN re UT request for extension of discovery responses.	0.30				0.30		0.30	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
7/13/20	Exchange emails with OC re extension of response to discovery requests and other pretrial deadlines (0.30) and phone conferences with Client re same and impact on trial setting (0.30).	0.60				0.60		0.60	4
7/16/20	Communicate with EN re inclusive efforts re underrepresented minorities.	0.10	0.10		0.10				4
7/22/20	Draft email(s) to and review email(s) from: Client and RSN re case brought by professor at University of Rochester.	0.00				0.40	0.40	0.00	4
7/22/20	Discuss potential relevance of a harassment case at another University w/ RWS and EN.	0.00	0.25	0.25	0.00				4
8/13/20	Legal research re potential experts on gender discrimination in STEM, women discriminating against women and pregnancy discrimination, including review of academic literature re same, draft emails to and place phone calls to potential witnesses, and draft email to RSN re same.	2.90				2.90		2.90	4
8/13/20	Discussion w/ RWS re potential experts for case (0.10); contact potential experts (0.50, reduced to 0.10).	0.20	0.60	0.40	0.20				4
8/17/20	Exchange emails with OC re scheduling phone conference to discuss discovery by UT.	0.00				0.20	0.20	0.00	4
8/18/20	Phone conference(s) with OC re UT document production and prioritization of search efforts (0.50) and draft emails to and review emails from OC and RSN re same (0.30).	0.80				0.80		0.80	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
8/18/20	R&R UT production 871-10475.	3.75	4.25	0.50	3.75				4
8/19/20	R&R UT production 871-10475.	3.00	3.50	0.50	3.00				4
8/20/20	R&R UT production 871-10475.	4.25	5.00	0.75	4.25				4
8/21/20	Exchange emails with OC re documents reflecting employee compensation.	0.20				0.20		0.20	4
8/21/20	R&R UT production 871-10475.	4.25	4.75	0.50	4.25				4
8/21/20	R&R UT's spreadsheets in particular.	2.00	2.50	0.50	2.00				4
8/31/20	Legal research: re <b>disparate impact</b> claims, elements, exhaustion requirements and potential experts re same, including search of listserves and review of emails from other attorneys (2.50) and phone call with potential expert (0.30).	0.00				2.80	2.80	0.00	4
9/1/20	Phone conference(s) with RSN re: search for potential expert witnesses re damages, tenure/STEM discrimination and depositions/discovery (0.50) and draft emails to RSN re same (0.20); phone conference(s): with Client re speaking with Manuel Blum re possible experts on gender discrimination in STEM (0.10) and draft emails to and review emails from Client re same (0.10).	0.90				0.90		0.90	4
9/1/20	Contact potential economic expert for EN.	0.10	0.10		0.10				4
9/1/20	Confer w/ RWS re experts on discrimination/tenure, damages, and next steps in discovery.	0.50	0.50		0.50				4

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/2/20	Trade dates with RWS re depositions of UT folks.	0.00	0.25	0.25	0.00				4
9/2/20	Research on potential experts from which we were selecting our testifying experts regarding <b>disparate impact</b> and STEM discrimination.	0.25	0.50	0.25	0.25				4
9/2/20	Confer w/ potential experts for <b>disparate impact</b> and disparate treatment claims.	0.40	0.80	0.40	0.40				4
9/2/20	Exchange emails with RSN re search for <b>disparate impact</b> expert to evaluate tenure data/trends, legal research re <b>disparate impact</b> claims and elements (0.30); draft email(s) to and review email(s) from: RSN re search for damages expert, discovery plan re possible UT witnesses for depositions and topics for org rep (0.40).	0.40				0.70	0.30	0.40	4
9/3/20	Exchange emails with RSN re search for experts and use of service to help.	0.30				0.30		0.30	4
9/3/20	Confer w/ RWS re using a professional service to help us find expert witnesses - Expert Institute (0.30); contact potential expert (M) on <b>disparate impact</b> and disparate treatment claims (0.10, reduced to 0.00); update team on a couple of deadends on experts thus far (0.10, reduced to 0.00).	0.30	0.50	0.20	0.30				4
9/4/20	Exchange emails with OC re potential topics for 30(b)(6) organizational representative (0.30); legal research re expert witness re discrimination in STEM, pregnancy discrimination, women discriminating against other women, including phone calls and emails with other attorneys and scholars re potential candidates, review of academic research in field, and case law concerning	4.20				4.40	0.20	4.20	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	admissibility of same (3.00); draft email to Client re same (0.10); phone conference(s): with RSN re search for experts re damages, discrimination in STEM, and <b>disparate impact</b> , and topics for 30(b)(6) deposition (1.00, reduced to 0.80).								
9/4/20-1	Discuss w/ service re: two searches for experts on <b>disparate impact</b> and disparate treatment.	0.25	0.25		0.25				4
9/4/20-2	R&R of RWS's inquiry for an expert (0.10, reduced to 0.00); research additional experts on <b>disparate impact</b> and disparate treatment through publications (1.50, reduced to 0.75); contact Expert Institute and communicate re each of the experts we want help engaging for <b>disparate impact</b> and disparate treatment (0.50); discuss expert search effort w/ RWS (1.00, reduced to 0.80).	2.05	3.10	1.05	2.05				4
9/7/20	Review email(s) from: Client re search for potential expert witnesses and damage documents.	0.10				0.10		0.10	4
9/8/20	R&R of EN's email inquiry to a potential witness and advice re same.	0.10	0.25	0.15	0.10				4
9/8/20	R&R of EN's W2s 2013-2019.	0.10	0.50	0.40	0.10				4
9/8/20	Confer w/ RWS and EN re SWood video interview admitting that “work-life balance is a bit of a myth.”	0.75	1.00	0.25	0.75				4
9/8/20	Confer w/ RWS re expert pros and cons on each potential expert issue.	1.25	1.50	0.25	1.25				4
9/8/20	R&R of additional expert search options located by RWS.	0.00	0.10	0.10	0.00				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/8/20	Phone conference with RSN and Client re expert witnesses and damage issues, including sabbaticals, better able to obtain research funding, engage in for profit work and other benefits enjoyed by tenured professors (1.00); legal research re expert witness re discrimination in STEM, pregnancy discrimination, women discriminating against other women, including phone calls and emails with other attorneys and scholars re potential candidates, review of academic research in field, and case law concerning admissibility of same (2.60); phone conference with PGlick re same (0.50); phone conference(s): with TGlass re possibly using rehabilitation expert witness on damages and recommendations (0.30); background research re Dean Wood, including prior speeches and work relating to gender equity issues at UT and in STEM (1.40); draft emails to and review emails from Client and RSN re same (0.40).	7.20				7.20		7.20	4
9/8/20	R&R of SWood video re women in STEM and admitting to skewed view of personal boundaries v work.	0.20	0.20		0.20				4
9/8/20	Confer w/ RWS and EN re experts on damages, discrimination/STEM and disparate impact and evidence re same.	0.75	1.00	0.25	0.75				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/9/20	Legal research re expert witness re discrimination in STEM, pregnancy discrimination, women discriminating against other women, including phone calls and emails with other attorneys and scholars re potential candidates, review of academic research in field, and case law concerning admissibility of same (2.40); draft email(s) to and review email(s) from: OC and RSN re additional topics for 30(b)(6) depositions and scheduling of same (0.30); background research re Dean Wood, including prior speeches and work relating to gender equity issues at UT and in STEM (1.10).	3.60				3.80	0.20	3.60	4
9/9/20	Confer w/ RWS on deposition order, content, and division of assignments.	0.50	0.50		0.50				4
9/9/20	R&R emails re scheduling of depositions and corp rep topics.	0.10	0.25	0.15	0.10				4
9/10/20	Confer w/ RWS re potential expert re discrimination in STEM.	0.40	0.40		0.40				4
9/10/20	Research to identify potential experts for damages relating to denial of tenure, discrimination/bias in STEM, and remedies available in tenure denial case (4.50); draft emails to and review emails from Client re same (0.10); phone conference with RSN re same (0.40); phone conference with PGlick re possibly serving as expert witness on discrimination issues, qualifications and research and past work as expert (0.50).	5.50				5.50		5.50	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/11/20	Research re potential experts on discrimination and bias, including review of scholarly studies of discrimination, bias, women against women and bias in STEM, review of prior expert reports and cases concerning admissibility (4.10, reduced to 3.10) and draft emails to possible experts and Client re same (.8); phone conference with Client re same (0.90); draft email(s) to and review email(s) from: OC re deposition scheduling. (0.20, reduced to 0.00).	4.80				6.00	1.20	4.80	4
9/11/20	R&R of RWS's reaching out to PGlick and Client re same discrimination in STEM.	0.00	0.10	0.10	0.00				4
9/14/20	Confer w/ RWS re which experts to retain.	0.30	0.60	0.30	0.30				4
9/14/20	Phone conference(s) with RSN and expert service re search for expert witnesses re damages and gender bias in tenure trends at UT; phone conference with RSN and potential expert re discrimination in STEM (0.60); draft emails to and review emails from RSN re selecting expert on discrimination (0.20); legal research re field of study re discrimination, bias, bias in STEM and women discriminating against women, review of experts' publications, online videos, and contact references for expert candidates (4.30); review UT document production, draft notes and comments re same, identify important documents for later reference (3.00).	8.10				8.10		8.10	4
9/14/20	Confer w/ RWS and potential expert re discrimination in STEM.	0.30	0.60	0.30	0.30				4
9/15/20	Identify email support that SWood had engaged in pregnancy discrimination w/ EN and discussion w/ RWS and EN.	0.30	0.50	0.20	0.30				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/15/20	R&R of EN docs refuting one of SWood's reasons for not promoting EN - lack of local collaboration.	0.50	1.00	0.50	0.50				4
9/15/20	Research re retaining possible expert witnesses on gender bias and discrimination, including review of deposition transcript, case law and publications and discussions with other attorneys who have worked with potential experts (3.20); phone conference with RSN re same (0.20); draft emails to RSN re same (0.20); and phone conference with PGlick re retaining as expert (0.10); draft email(s) to and review email(s) from: OC and RSN re scheduling deposition for GFenves (0.20, reduced to 0.0); continue review of UT document production, draft notes and comments re same, identify important docs for future reference, and draft emails to and review emails from Client and RSN re same (4.80, reduced to 4.00); draft email(s) to and review email(s) from: Client re locating documents relevant to the case, including damage documents and emails re tenure denial (0.40).	8.10				9.10	1.00	8.10	4
9/15/20	Provide PGlick EN's CV and further discussion w/ RWS of which expert to choose.	0.50	0.50		0.50				4
9/15/20	Schedule depositions w/ UT.	0.00	0.25	0.25	0.00				4
9/15/20	Confer w/ RWS re selecting PGlick over other expert.	0.50	0.50		0.50				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/16/20	Exchange emails with Client and RSN re Client searching for relevant documents and emails (0.40); draft email(s) to and review email(s) from: legal assistant Susan Sinclair and Client re Dean SWood career and personal info (0.20); draft email(s) to and review email(s) from: OC re depo date for GFenves (0.20, reduced to 0.00); continue review of UT document production, draft notes and comments re same, identify important docs for future reference (2.80, reduced to 2.50).	2.90				3.60	0.70	2.90	4
9/16/20	Research on whether comparator faculty and administration witnesses have children or not in the context of disparate treatment.	0.50	0.50		0.50				4
9/17/20	Discuss w/ RWS re FERPA protection discussion w/ UT.	0.25	0.25		0.25				4
9/17/20	Exchange emails with RSN and OC re FERPA issues (0.50); exchange emails with PGlick re stereotype and bias (0.20); review Client documents and prepare for production to OC (1.30).	2.00				2.00		2.00	4
9/18/20	Research and discuss w/ RWS potential experts on damages.	0.50	0.50		0.50				4
9/18/20	Confer w/ Expert Institute re new search for statistical expert.	0.50	0.50		0.50				4
9/18/20	Phone conference with RSN interviewing potential expert witnesses on damages (0.50) and gender and pregnancy bias in tenure at UT (0.50); draft emails to and review emails from RSN and expert service re same (0.30); phone conference(s): with OC re discovery and FERPA issues, document production and draft emails to and review emails from OC re same (1.00); review UT document production,	8.20				8.20		8.20	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	draft notes and comments re same, identify important docs for later reference and draft emails to and review emails from Client and RSN re same (5.90).								
9/18/20	Work out production issues with UT.	0.10	0.50	0.40	0.10				4
9/19/20	Exchange emails with PGlick re preparing report and need for documents.	0.10				0.10		0.10	4
9/19/20	Discuss expert SB w/ RWS.	0.00	0.75	0.75	0.00				4
9/20/20	Phone conference(s) with RSN, EN and JHorn re hiring of expert witnesses, case strategy and themes, and pretrial schedule.	1.50				1.80	0.30	1.50	4
9/20/20	Phone conference(s) with RWS, EN and JHorn re hiring of expert witnesses, case strategy and themes, and pretrial schedule.	1.50	1.80	0.30	1.50				4
9/21/20	Draft email(s) to and review email(s) from: RSN, Client, SB and expert service re retaining expert SB to do vocational rehab analysis re economic impact of denial of tenure.	0.00				0.60	0.60	0.00	4
9/21/20	Retain SB as expert, confer with RWS and TGlass re same and schedule meeting and request documents from Client for SB (0.80); Inform TGlass we are retaining SB as expert on potential earnings (0.10); Confer w/ RWS re expert deadlines given the needed extra time of TGlass waiting on SB's report before TGlass can do his calculations (0.50) (all reduced to 0.00).	0.00	1.40	1.40	0.00				4
9/22/20	Phone conference(s): with RSN re selecting expert witnesses re damages and review of UT statistical data re gender bias in tenure and draft emails to and	1.50				1.50		1.50	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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	review emails from RSN, Client, and expert service re same (0.50); exchange emails with Client, SB and RSN re retaining SB and Zoom meeting with Client and SB relating to rehabilitation damages assessment and provide documents to SB re same (0.80); exchange emails with PGlick re deadline for report (0.20).								
9/22/20	Confer w/ EN re comparators and docs supporting (1.50, reduced to 1.25); Confer w/ RWS re two experts for on statistics (0.50); discuss with w/ SB's assistant, then report and discuss w/ RWS , SB's requests for and docs and protocol (1.00, reduced to 0.00); compile and provide docs to SB (0.75, reduced to 0.00); R&R UT's responses to our corp rep topics (1.00, reduced to 0.75); R&R of EN's CJulien emails (3.00, reduced to 2.50).	5.00	7.75	2.75	5.00				4
9/23/20	Discuss w/ RWS re statistics expert (0.30) and trial/discovery and deposition issues (0.90).	1.20	1.20		1.20				4
9/23/20	Discuss w/ RWS pushing depo dates back along with other deadlines	0.10	0.25	0.15	0.10				4
9/23/20	Phone conference(s) with RSN re expert witnesses on review of tenure data, document production, deposition schedule, 30(b)(6), and possible move of dispositive motion deadline or trial and draft emails to and review emails from RSN re same (0.90); phone conference(s) with OC re document production and documents to prioritize, 30(b)(6) topics and pretrial schedule, and draft emails to and review letter and emails from OC re same (1.30); continue review of UT document production including comparator dossiers, draft notes and comments re same and identify important documents for later use; draft email to client re same (4.00).	6.20				6.20		6.20	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/24/20	Exchange emails with expert SB re vocational rehab analysis/damage report and conference with Client.	0.00				0.30	0.30	0.00	4
9/25/20	Prepare EN for interview by SB (1.00); participate in SB interview of EN (2.00); post-interview, confer re same w/ RWS and EN (0.50).	0.00	3.50	3.50	0.00				4
9/25/20	Phone conference(s) with Client re expert witnesses on damages, including vocational rehab analysis, proposed discovery schedule, case status, and potential witnesses. (0.90, reduced to 0.50); exchange emails with OC re documents and information re tenure decisions including statistical data (0.40); Zoom conference with Client and SB re vocational rehab analysis for damages relating to denied tenure. (2.10, reduced to 0.00).	0.90				3.40	2.50	0.90	4
9/28/20	R&R of CIS data (student evaluation scores across categories and comparators).	1.00	1.50	0.50	1.00				4
9/28/20	R&R of UT's latest production 10476-10517.	0.75	1.00	0.25	0.75				4

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 51 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/28/20	Phone conference(s) with OC re documents and information to focus on in responding to discovery requests, including database with tenure candidate information, review letter from OC and draft emails to and review emails from OC re same (1.80); phone conference(s) RSN re document production issues and phone conference with OC re same (0.20); exchange emails with Client and RSN re document production status, phone conference with OC re same, and database at UT containing information re tenure candidates (0.30); exchange emails with Client and JHorn re student teaching evaluation scores/forms and comparisons between Client and other instructors (0.80); exchange emails with Client and SB re rehabilitation damage analysis and scheduling (0.30, reduced to 0.00).	3.10				3.40	0.30	3.10	4
9/28/20	R&R of JHorn's analysis of CIS scores and comparing to the data.	1.00	1.50	0.50	1.00				4
9/29/20	Confer w/ RWS re which statistics expert to choose.	0.10	0.10		0.10				4
9/29/20	Phone conference(s) with RSN re expert witness candidates for statistical analysis (0.10); exchange emails with Client re expert witnesses on statistical analysis and review of research/interview of one candidate (0.50); exchange emails with Client and RSN re potential student witness (0.20); exchange emails with OC and Client re UT database with info re tenure candidates (0.10); exchange emails with expert SB re retaining for review of damage issues (0.20 reduced to 0.00).	0.90				1.10	0.20	0.90	4
9/29/20	Note EN report to me that her post doc colleague is willing to testify.	0.10	0.10		0.10				4

1. Pre-Suit

4. Discovery

7. MSJ

9. Trial

11. Settlement

RSN: Robert S. Notzon

2. Pleadings

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8.1 Trial Prep

10.1 Post Trial

12. Workplace Issues

RWS: Robert W. Schmidt

3. Rule 16 Case Mgmt.

6. MTD (Doc. 22)

8.2 Focus Group

10.2 Fees & Costs

**Exhibit 3B (Phase), Page 52 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/29/20	Communicate w/ Expert Institute that we are still considering which expert to select for our statistical analysis.	0.10	0.10		0.10				4
9/30/20	Exchange emails with expert service re hiring of expert to review statistical trends in tenure relating to gender and probationary extensions due to child birth/pregnancy (0.20); continue review of UT document production including comparator dossiers, draft notes and comments re same and identify important documents for later use; draft emails to Client re same (3.30)	3.50				3.50		3.50	4
10/1/20	Review of CV and background of SThompson (0.50); finalize selection of SThompson as an expert re statistical analysis (0.10).	0.60	0.60		0.60				4
10/1/20	Continue review UT document production including comparator dossiers, draft notes and comments re same and save important documents for later use; draft email to client re same; draft email to and review email from OC re same and missing documents in UT document production. (4.70); exchange emails with expert witness service re retaining SThompson (0.20); exchange emails with potential experts re discrimination issues advising of selection of other candidate as expert (0.30); phone conference(s): with Client and SB re rehabilitation expert damages (1.50, reduced to 0.00).	5.20				6.70	1.50	5.20	4
10/1/20	Confer w/ RWS and EN re docs in P&T dossiers to review and verify for comparators.	0.50	0.50		0.50				4
10/1/20	Participate in SB's follow-up interview of EN.	0.00	1.50	1.50	0.00				4

1. Pre-Suit

2. Pleadings

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

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9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 53 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/2/20	R&R re update on missing doc from UT re Paola Passalacqua.	0.25	0.25		0.25				4
10/2/20	Confer w/ JHorn re disparate <b>impact claims</b> and approach w/ RWS.	0.00	0.50	0.50	0.00				4
10/2/20	Exchange emails with EN, JHorn and RSN re <b>disparate impact</b> claim/theories and possible claim relating to third year review and phone conference with RSN re same (0.70, reduced to 0.00); phone conference(s): with RSN re information gathered from other employment attorney re prior trial against UT (0.60).	0.60				1.30	0.70	0.60	4
10/2/20	Confer w/ RWS re prior trial in tenure case against UT.	0.60	0.60		0.60				4
10/2/20	Confer w/ EN re third year review and effect on tenure between men and women.	0.50	1.00	0.50	0.50				4
10/5/20	Exchange emails with RSN re depo schedule.	0.00				0.10	0.10	0.00	4
10/6/20	Exchange emails with SThompson re documents necessary for his evaluation and phone conference re same (0.20); exchange emails with OC re document production relating to tenure decisions and <b>disparate impact</b> (0.30, reduced to 0.00).	0.20				0.50	0.30	0.20	4
10/7/20	Call w/ SThompson re statistical analysis.	0.50	0.50		0.50				4
10/7/20	Phone conference(s) with SThompson and RSN re statistical data from UT for analysis of tenure trends relating to women and faculty with pregnancy extension.	0.50				0.50		0.50	4

1. Pre-Suit

2. Pleadings

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

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9. Trial

10.1 Post Trial

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11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 54 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/8/20	Exchange emails with OC re document production and expert witness deadline.	0.20				0.20		0.20	4
10/9/20	Phone conference(s) with OC re discovery issues and document production.	0.20				0.20		0.20	4
10/14/20	R&R UT's production 10518-15453 and 15454-17391.	4.00	4.00		4.00				4
10/15/20	R&R UT's production 10518-15453 and 15454-17391.	4.25	4.75	0.50	4.25				4
10/16/20	R&R UT's production 10518-15453 and 15454-17391.	3.75	4.50	0.75	3.75				4
10/16/20	R&R of UT's production 17392-17570 and 17571-24953.	0.10	0.10		0.10				4
10/17/20	R&R UT's production 10518-15453 and 15454-17391.	3.70	4.20	0.50	3.70				4
10/19/20	Discuss w/ RWS and UT re changing GF'enves's deposition due to another schedule change emergency and not getting the corp rep topics verified.	0.50	1.00	0.50	0.50				4
10/19/20	Deliberate, decide to put off GFenves depo until November.	0.00	0.25	0.25	0.00				4
10/19/20	R&R UT's production 15454-17391 and 17571-24953.	3.50	4.00	0.50	3.50				4
10/19/20	Phone conference(s) with RSN re deposition of GFenves as fact witness and organizational representative, scheduling issues, scope of testimony and related issues and draft emails to and review emails from RSN re same.	0.20				0.60	0.40	0.20	4
10/20/20	R&R UT's production 15454-17391 and 17571-24953.	3.25	3.75	0.50	3.25				4
10/21/20	R&R UT's production 15454-17391 and 17571-24953.	3.50	4.00	0.50	3.50				4

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RSN: Robert S. Notzon

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RWS: Robert W. Schmidt

3. Rule 16 Case Mgmt.

6. MTD (Doc. 22)

8.2 Focus Group

10.2 Fees & Costs

**Exhibit 3B (Phase), Page 55 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/22/20	Review email(s) from Client re possible <b>disparate impact</b> angle/claim.	0.00				0.10	0.10	0.00	4
10/22/20	R&R of EN idea re <b>disparate impact</b> claim approach.	0.00	0.25	0.25	0.00				4
10/23/20	R&R of RWS's first draft of second RFPs	0.00	0.10	0.10	0.00				4
10/23/20	Review UT document production of 10/16/20, draft notes and comments re same, identify important documents for later reference (4.60, reduced to 3.60), draft second RFPs to UT and emails to and review emails from RSN and Client re same (2.00, reduced to 0.00).	3.60				6.60	3.00	3.60	4
10/23/20	R&R UT's production 17571-24953 (4.00, reduced to 3.00); R&R of UT's 1st RFPs and 1st Ints and noting issues, potential objections and proposed response notes (2.00, reduced to 1.50).	4.50	6.00	1.50	4.50				4
10/25/20	R&R of RWS's draft of second RFPs to UT and drafting proposed edits.	0.00	1.50	1.50	0.00				4
10/26/20	Edit RWS draft of 2nd RFPs (1.00), and confer w/ RWS re same (0.40).	0.00	1.40	1.40	0.00				4
10/26/20	Decide the probable number of hours for each depo and discuss w/ RWS.	0.50	0.50		0.50				4
10/26/20	R&R UT's production 17571-24953.	3.00	3.00		3.00				4
10/26/20	Review RSN edits to P's second RFPs and exchange emails from RSN re same.	0.00				0.40	0.40	0.00	4
10/27/20	Confer w/ RWS re P's second RFP and documents previously produced by UT and note news of EN's father's serious diagnosis and expected difficulties for at least the next few months.	0.00	0.30	0.30	0.00				4

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RSN: Robert S. Notzon

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12. Workplace Issues

RWS: Robert W. Schmidt

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8.2 Focus Group

10.2 Fees & Costs

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/27/20	Phone conference(s) with RSN re P's second RFP and documents previously produced by UT (0.30, reduced to 0.00); review documents produced by UT, including making notes re same and identifying important documents for later reference (5.10).	5.10				5.40	0.30	5.10	4
10/27/20	R&R of UT's production 17571-24953.	3.00	3.50	0.50	3.00				4
10/28/20-3	Finalize and email to OC Plaintiff's Second RFPs (0.50, reduced to 0.00); review documents produced by UT, including making notes re same and identifying important documents for later reference (4.40)	4.40				4.90	0.50	4.40	4
10/28/20-2	R&R of UT's production 17571-24953.	3.00	4.00	1.00	3.00				4
10/28/20-1	Provide last edits on 2nd RFPS and discuss w/ RWS.	0.00	1.00	1.00	0.00				4
10/29/20-1	Phone conference(s) with RSN re deposition schedule, length of depositions and documents needed for depo prep and draft emails to and review emails from OC re same.	0.40				0.40		0.40	4
10/29/20-2	Communicate with UT about our anticipated depo lengths.	0.25	0.25		0.25				4
10/29/20-3	R&R of UT's production 17571-24953.	2.50	3.00	0.50	2.50				4

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8.1 Trial Prep

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9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 57 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/30/20	R&R of UT's production 17571-24953.	3.00	3.50	0.50	3.00				4
10/31/20	R&R of UT's production 17571-24953.	3.25	3.75	0.50	3.25				4
11/1/20	R&R of UT's production 17571-24953.	4.75	5.25	0.50	4.75				4
11/2/20	R&R of UT's production 17571-24953.	2.00	2.50	0.50	2.00				4
11/7/20	Phone conference(s) with RSN and SThompson re statistical review of UT tenure data.	0.50				0.50		0.50	4
11/7/20	Confer w/ RWS and SThompson re UT tenure data.	0.50	0.50		0.50				4
11/10/20	Review email and letter from OC re discovery issues and pretrial schedule.	0.30				0.30		0.30	4
11/10/20	R&R of summary spreadsheets re tenure cases in engineering during last 10 years and organizing and highlighting for distinctions between the potential comparators and noting issues for discussion w/ SThompson.	2.50	3.00	0.50	2.50				4
11/11/20	Phone conference(s) with RSN re discovery update on document production from UT, possible deposition dates and need to adjust pretrial schedule as set out in letter from OC and draft emails to and review emails from RSN and EN re same (0.60); phone conference(s): with PGlick re expert report scope and deadline (0.50); review UT document production including tenure data spreadsheets (1.60).	2.70				2.70		2.70	4
11/13/20	Exchange emails with OC re conferring re pretrial deadlines and status.	0.20				0.20		0.20	4

1. Pre-Suit  
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8.1 Trial Prep  
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9. Trial  
10.1 Post Trial  
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11. Settlement  
12. Workplace Issues

RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 58 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
11/16/20	Identify two more comparators to add to our discovery requests.	0.25	0.25		0.25				4
11/16/20	Phone conference(s) with RSN, Client and JHorn re possible moving of trial date, pretrial deadlines, witnesses for deposing and questioning, document production and related pretrial issues and draft emails to and review emails from same re same.	1.50				1.80	0.30	1.50	4
11/16/20	Confer w/ RWS and EN re case and next steps.	1.50	1.80	0.30	1.50				4
11/17/20	Exchange emails with JHorn and RSN re pay issues and possible retaliation claims.	0.00				0.50	0.50	0.00	4
11/17/20	Confer w/ RWS, EN, and JHorn re JHorn's observations of the pay disparities.	0.50	0.50		0.50				4
11/18/20	Review UT document production and tenure data spreadsheets to determine possible comparators and draft email to RSN, EN, and JHorn re same/	3.10				3.10		3.10	4
11/20/20	Exchange emails with Client and RSN re documents to request from UT for comparators and tenure data.	0.30				0.30		0.30	4
11/20/20	Confer w/ RWS and EN re adding eight more comparator names for dossier production.	0.75	0.75		0.75				4
11/24/20	Legal research on pregnancy discrimination (including 8 law journal articles).	3.50	4.00	0.50	3.50				4

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
11/24/20	R&R on tenure spreadsheet summary over 12 years w/ additional review of the data across the several pages of versions and organization of the information and observing the nature of consistent and inconsistent data with comparators.	2.00	2.00		2.00				4
11/24/20	Phone conference(s) with RSN, Client, JHorn re UT interrogatories and requests for production to Client, docs produced by D including tenure data spreadsheet, discovery schedule, case facts and themes and draft and receive emails to and from same re phone conference.	0.90				0.90		0.90	4
11/25/20	Exchange emails with OC re extension of response deadlines to both parties' discovery requests.	0.20				0.20		0.20	4
11/25/20	R&R of UT request for discovery response extension and approval - 30 more days.	0.10	0.10		0.10				4
12/7/20	Phone conference(s) with Client re ruling on motion to dismiss (Doc. 32), responses to UT's discovery, depositions in new year, and Client's job applications.	0.50				0.50		0.50	4
12/8/20	Research on potential gender issues occurring in University Faculty for use in the case.	0.50	0.50		0.50				4
12/8/20	Exchange emails with Client re Client email and UT workshop on gender disparity issues in STEM faculty.	0.20				0.20		0.20	4
12/21/20	Exchange emails with OC re extension of response deadline to UT's discovery	0.20				0.20		0.20	4

1. Pre-Suit

2. Pleadings

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

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9. Trial

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11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	requests								
12/21/20	R&R of RWS' discovery extension request	0.00	0.10	0.10	0.00				4
1/6/21	R&R of UT's update on expected production and search terms.	0.50	0.50		0.50				4
1/6/21	Review email(s) from OC (Amy Hilton) re discovery requests and key word searches.	0.10				0.10		0.10	4
1/21/21	Exchange emails with Client re responding to UT's discovery requests and her attempts to gain job at other universities.	0.30				0.30		0.30	4
1/22/21	Confer w/ RWS re next steps re discovery requests, responses, depositions, and expert reports.	0.40	0.40		0.40				4
1/22/21	Phone conference(s) with Client and JHorn re need to respond to UT's discovery requests, search for documents, potential depositions and case status (0.40); draft initial proposed responses and objections to UT's interrogatories and requests for production to Client, including notes and emails to Client re same (2.80); exchange emails with RSN re case and discovery status, including responding to discovery requests, setting depositions, helping experts with docs and review case documents re same (0.40).	3.60				3.60		3.60	4
1/22/21	R&R and editing of RWS's first draft of interrogatory responses.	1.25	1.50	0.25	1.25				4
1/25/21	Review email(s) from Client re Client's discovery responses.	0.20				0.20		0.20	4

1. Pre-Suit

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6. MTD (Doc. 22)

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11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 61 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
1/25/21	Communicate w/ UT re setting depositions in Feb.	0.00	0.25	0.25	0.00				4
1/25/21	R&R and editing of EN's draft responses to interrogatories.	0.50	0.50		0.50				4
1/27/21	Phone conference(s) with Client and JHorn re plaintiff's interrogatory responses and responding to UT's document requests (0.50); phone conference(s) with TGlass re damages report (0.10).	0.60				0.60		0.60	4
1/28/21	Phone conference(s) with RSN re P's draft discovery responses and objections (0.20); draft P's interrogatory responses and objections including extensive review of Client and UT documents re same for case facts, comparator documents (9.10 reduced by 3.50 for work re <b>Equal Pay Act</b> , <b>disparate impact</b> and <b>retaliation</b> claims).	5.80				9.30	3.50	5.80	4
1/29/21	R&R of UT's responses to 2nd RFPs.	0.25	0.50	0.25	0.25				4
1/29/21	R&R of UT's production 24954-25569, 25570-26194, and 26195-26509.	0.50	0.50		0.50				4
1/29/21	Phone conference(s) with RSN, Client and JHorn re responses to D's discovery requests, depositions and discovery/case status (0.50); review Client documents and UT document production and finalize responses and objections to UT's requests for production and interrogatories, including review of edits from Client and RSN and exchange emails re same (6.70).	7.20				7.20		7.20	4
1/29/21	Legal research re objections to UT's discovery requests.	1.25	1.50	0.25	1.25				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 62 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
1/29/21	R&R and editing of RWS's second draft Int responses and EN's edits (2.50, reduced to 2.00); R&R and editing of RWS's draft responses to RFPs and edits (2.50, reduced to 2.00); another round of edits after further review and comment by EN (1.00); R&R and edits of final version of EN's responses to Ints and RFPs (1.50, reduced to 1.00).	6.00	7.50	1.50	6.00				4
1/30/21	Exchange emails with OC re UT's document production (0.10); review UT's document production and make notes re same (3.60).	3.70				3.70		3.70	4
1/30/21	R&R of UT's production 24954-25569, 25570-26194, and 26195-26509.	5.00	6.00	1.00	5.00				4
2/1/21	R&R of UT's production 24954-25569, 25570-26194, and 26195-26509.	3.50	4.00	0.50	3.50				4
2/2/21	R&R of UT's production 24954-25569, 25570-26194, and 26195-26509.	4.00	4.50	0.50	4.00				4
2/3/21	R&R of UT's production 24954-25569, 25570-26194, and 26195-26509.	3.25	3.75	0.50	3.25				4
2/5/21	Exchange emails with OC, EN, JHorn and RSN re depo dates (0.20, reduced to 0.00); review of UT document production from 1/29/21, draft notes and comments re same, identify important documents for later reference (4.90, reduced to 3.90).	3.90				5.10	1.20	3.90	4
2/5/21	Communicate w/ UT (and RWS and EN) re setting depositions in March and April.	0.00	0.50	0.50	0.00				4
2/8/21	Communicate w/ UT (and RWS and EN) re setting depositions in March and April.	0.00	0.25	0.25	0.00				4
2/8/21	Review email(s) from: OC re proposed dates for depositions.	0.00				0.10	0.10	0.00	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/9/21	Phone conference(s) with RSN re scheduling depositions and exchange emails re same.	0.00				0.30	0.30	0.00	4
2/9/21	Confer w/ RWS and EN re upcoming depositions.	0.25	0.25		0.25				4
2/10/21	Exchange emails with Client and RSN re scheduling depositions.	0.00				0.20	0.20	0.00	4
2/10/21	Confer w/ RWS and EN re depo scheduling.	0.25	0.25		0.25				4
2/11/21	Phone conference(s): with Client, RSN and JHorn re depositions and corp rep topics and comparator issues.	0.50				0.50		0.50	4
2/11/21	Finalize depo schedule and corp rep topics w/ UT.	0.50	0.50		0.50				4
2/12/21	Phone conference(s) with OC and RSN re organizational rep depositions and topics, and draft emails setting same, review of letter from OC re same, and phone conference with RSN re same.	0.90				0.90		0.90	4
2/12/21	Phone call w/ UT and RWS re depositions and corp rep topics and comparator issues.	0.50	0.50		0.50				4
2/24/21	Draft amended corp rep topics for UT and comments for RWS review (1.50, reduced to 1.25), and confer w/ RWS re same (1.00, reduced to 0.75).	2.00	2.50	0.50	2.00				4
2/24/21	Phone conference(s) with RSN re org rep deposition topics, additional docs needed and expert witnesses (0.80); exchange emails with OC and RSN re org rep depo topics and comparators (0.30)	1.10				1.10		1.10	4

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12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/25/21	Prepare emails and notes re upcoming depositions and pending discovery issues.	0.50				0.50		0.50	4
2/27/21	Draft email to Client re search for documents in response to D's RFP, including review of RFP and drafting notes re same.	1.10				1.10		1.10	4
3/2/21	Phone conference(s) with RSN and Client re topics for organizational rep depositions, proper comparators, UT leave and extension policies re childbirth, and UT document production generally (0.40); exchange emails re UT org rep depo topics (0.30); review UT document productions re same, including assistant prof spreadsheets and dossiers re comparators, and draft notes re same (2.60).	3.30				3.30		3.30	4
3/2/21	Confer w/ RWS re ATewfik depo.	0.40	0.40		0.40				4
3/5/21	Phone conference(s) with Client re comparison to other assistant professors, expert witness status, damages, and case facts generally (0.60); phone conference(s) with PGlick re report on discrimination and review case documents re same (0.40); phone conference(s) with TGlass re client damages and expert report re same (0.10); phone conference(s) with SThompson re report and documents needed relating to comparator data (0.10); pone conference(s) with RSN re expert reports, organizational rep depositions and damages (0.10); review UT document production including re comparator dossiers and annual reviews; review Client documents re same and damages to provide experts (1.90); exchange emails with SB re call with Client and damage issues (0.20).	3.20				3.40	0.20	3.20	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/5/21	R&R UT's production 26510-26704.	0.75	1.00	0.25	0.75				4
3/5/21	Create notes on comparisons of the faculty comparators using the P&T dossiers w/ EN.	2.50	3.00	0.50	2.50				4
3/7/21	Exchange emails with OC re organizational rep depo topics including proper comparators, faculty evaluations, and other topics (0.30); review UT document production and RFPs including review of tenure dossiers for comparator assistant professors and annual evaluations (5.10, reduced to 4.10).	4.40				5.40	1.00	4.40	4
3/8/21	Phone conference(s) with PGlick (0.80); phone conference(s) with RSN re UT spreadsheets, tenure data for SThompson, including review spreadsheets and supporting documents, and expert report deadline (0.70); exchange emails with RSN and OC re corporate rep depositions and tenure cases decided by former president Powers (0.20); review email(s) from RSN and JHorn re SThompson (0.10).	1.80				1.80		1.80	4
3/8/21	Call w/ SThompson re claims and report (0.50); formally engage SThompson as expert for us with approval from EN and RWS, too (1.00).	1.50	1.50		1.50				4
3/8/21	Confer w/ RWS about changing expert deadlines given the changes to the discovery responses.	0.25	0.25		0.25				4
3/8/21	Verify w/ RWS re summary spreadsheets for depo prep (0.50); confer with BDower re corp rep topic six (0.25).	0.75	0.75		0.75				4

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/9/21	Exchange emails with RSN, SB, JHorn and EN re SB and zoom conference, supporting documents and damage issues.	0.00				0.40	0.40	0.00	4
3/9/21	Communicate, agree with UT to move expert deadlines for both parties: ours to April 9 and UT's to May 7th (0.25); relay extension to PGlick, SThomspon, SB, TGlass (0.25, reduced to 0.00).	0.25	0.50	0.25	0.25				4
3/9/21	R&R of JHorn spreadsheet re comparators from tenure challenge in early 2019.	2.00	2.50	0.50	2.00				4
3/9/21	Check w/ SB re planned Zoom call for today (0.10); prepare for Zoom meeting w/ SB and EN (0.50); Zoom meeting w/ SB and EN (1.00).	0.00	1.60	1.60	0.00				4
3/10/21	Phone conference(s) with RSN re PGlick report and confer with PGlick re same, supplemental document production to UT (0.30); exchange emails with RSN and PGlick re his report, and phone call discussing same (0.20).	0.50				0.50		0.50	4
3/10/21	Schedule call w/ PGlick for tomorrow morning to discuss report and case.	0.00	0.10	0.10	0.00				4
3/10/21	R&R of new docs from EN and confer w/ RWS a supplemental production to UT.	1.00	1.50	0.50	1.00				4
3/11/21	Prepare for depo of SWood including R&R of RWS suggestions of topics and list and review of multiple documents to cover/use in the SWood depo.	2.00	2.50	0.50	2.00				4
3/11/21	Confer w/ RWS and PGlick re report and case issues.	1.40	1.40		1.40				4
3/11/21	Phone conference(s) with RSN and PGlick re report and findings (1.40); phone	2.10				2.10		2.10	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	conference(s) with RSN re PGlick and SThompson findings and reports, and review docs relating to same (0.40); legal research re discoverability of draft expert reports (0.30).								
3/12/21	Confer w/ SThompson re his report.	0.50	0.50		0.50				4
3/12/21	Discuss SThompson report w/ RWS.	0.75	1.00	0.25	0.75				4
3/12/21	Confer w/ JHorn re late, early and other terms used w/ tenure cases by UT and how best to advise the experts on term usage in their reports.	0.75	0.75		0.75				4
3/12/21	Confer w/ RWS re videotaping the depositions (0.25); confer w/ RWS and UT re corporate rep topics (0.50).	0.75	0.75		0.75				4
3/12/21	Exchange emails with RSN re SThompson's findings, PGlick report, and upcoming depositions and topics for org reps (0.70); exchange emails with Client, JHorn and RSN re report of SThompson and identification of "early" tenure cases (0.40); exchange emails with OC re organizational rep deposition issues and scope including comparators for GFenves (0.30).	1.40				1.40		1.40	4
3/12/21	R&R of PGlick report (2.00); confer w/ RWS re same (1.00, reduced to 0.75).	2.75	3.00	0.25	2.75				4
3/13/21	Review and note potential edits to PGlick report for discussion w/ RWS (1.50); confer w/ RWS re PGlick changes/edits to report for focus (0.50).	2.00	2.00		2.00				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/13/21	R&R of UT's production and notes in prep for SWood, CJulien, and ATewfik depositions (2.50, reduced to 2.00); R&R of materials from JHorn for use in SWood and ATewfik depositions (3.00, reduced to 2.50).	4.50	5.50	1.00	4.50				4
3/14/21	R&R of UT's production and notes in prep for SWood, CJulien, and ATewfik depositions.	3.00	3.00		3.00				4
3/14/21	Confer w/ RWS re listed comparators in the corp rep topics making sure who we want and don't want and review of documents in support.	0.50	0.50		0.50				4
3/15/21	Prepare questions and cross-reference with exhibits for the depositions.	4.00	4.00		4.00				4
3/15/21	Phone conference(s) with RSN re prep for upcoming depositions and review of UT document production (0.40); review UT document production including comparator dossiers and spreadsheets re tenure decisions and emails relating to Client's tenure decision, identifying and culling documents for potential use in depositions, and draft notes re important evidence (5.80).	6.20				6.20		6.20	4
3/16/21-1	Reach agreement w/ RWS re corp rep topic details in consideration of UT's issues and proposals; prior to confirming, finalize with UT for attachment to depo notices (0.50); draft and serve depositions notices for SWood - fact and corp rep (0.50); clarify SWood depo notice and resolve issues between us and UT and with the court reporter (0.50).	1.50	1.50		1.50				4
3/16/21-2	Confer w/ RWS re P&T processes at each level of P&T review at UT.	1.00	1.00		1.00				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/16/21-3	Confer w/ RWS and EN re tenure spreadsheet and evidence of cat's paw from GFenves and EN's memory of JZoldan's experience conveyed to EN back when JZoldan was initially denied tenure.	1.00	1.00		1.00				4
3/16/21-4	R&R of docs produced by UT in prep for corp rep depos.	1.75	2.00	0.25	1.75				4
3/16/21-5	R&R of RWS draft email to UT re depo recording protocols for agreement (0.25); R&R of RWS draft notices for ATewfik and CJulien - fact and corp reps (0.25) (all reduced to 0.00).	0.00	0.50	0.50	0.00				4
3/16/21-6	Exchange emails with OC and RSN re document production, locating dossiers, and deposition issues, including Zoom recording, designation of organizational representatives and scope for each (1.80); phone conference(s) with RSN re depo notices/UT document production (0.20); draft depo notices of organizational reps ATewfik, SWood, and CJulien, including review of emails conferring with OC re scope of depo topics and wording (0.80); continue reviewing UT doc production including extensive review of comparator dossiers, spreadsheets re tenure decisions and emails relating to Client's tenure decision, identifying and culling documents for potential use in depos, and draft notes re important evidence (9.30, reduced to 8.30); exchange emails with Client and RSN re comparators, including JZoldan and tenure application facts (0.80).	11.90				12.90	1.00	11.90	4
3/17/21	R&R of JHorn suggested questions and documents for SWood and CJulien depos.	1.75	2.00	0.25	1.75				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/17/21	Preparation of questions and cross referencing with exhibits for the depositions including conferring w/ RWS re same.	2.50	3.00	0.50	2.50				4
3/17/21	Phone conference(s) with RSN re deposition prep for SWood and CJulien depos, including potential exhibits, questions and strategy generally.	1.10				1.10		1.10	4
3/17/21	R&R of Sangavi tenure dossier provided by UT at RWS's request.	1.50	1.50		1.50				4
3/17/21	R&R of docs set out by RWS specifically for use in depos and also EN's dossier and Dean's summaries of the comparators.	3.00	3.50	0.50	3.00				4
3/17/21	Continue reviewing UT's and P's document production for documents to use as possible exhibits in depos, including comparator dossiers and spreadsheets re tenure decisions and emails relating to Client's tenure decision and pregnancy extension issues, identifying and culling documents for potential use in depos, and draft notes re important evidence.	10.20				10.20		10.20	4
3/17/21	Phone conference(s) with OC and RSN re conduct of depositions, objections and related discovery issues.	0.40				0.40		0.40	4
3/17/21	Confer w/ UT and RWS re depos.	1.10	1.10		1.10				4
3/18/21	Attend and record SWood deposition, confer with RSN and Client throughout, including comments re SWood testimony, possible questions, exhibits and depo strategy (9.40); phone conference(s) with Client and RSN re depo of Wood, information learned/inaccuracies in deposition, and questions/strategy for depo	11.40				11.40		11.40	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	of CJulien tomorrow (1.60); phone conference(s) with RSN re Wood depo and prep for CJulien depo tomorrow (0.40).								
3/18/21	SWood depo prep (3.00, reduced to 2.50); take SWood deposition (9.75); confer w/ RWS re same (0.40) and prep for CJulien depo tomorrow (0.60).	12.25	12.75	0.50	12.25				4
3/18/21	Review UT and P's document production for potential depo exhibits for CJulien depo tomorrow and draft emails to RSN and OC re same.	2.60				2.60		2.60	4
3/19/21	CJulien depo prep (2.00, reduced to 1.75); take CJulien deposition (6.00); confer w/ RWS re SWood and CJulien depositions and prep for ATewfik depo tomorrow (1.00).	8.75	9.00	0.25	8.75				4
3/19/21	Confer w/ EN re CJulien and SWood known lies (contradictions with information specifically shared with or known by EN).	1.00	1.00		1.00				4
3/19/21	Confer with RSN before depo of CJulien re same and possible questions/exhibits/strategy (0.80); attend and record deposition, confer with co-counsel and Client re CJulien testimony, possible questions, exhibits and strategy (6.00); phone conference(s) with RSN and Client re depositions of CJulien and SWood, high points and possible questions for depo of GFenves, other depositions (0.50); phone conference(s) with RSN after CJulien depo re same, best testimony and remaining issues for other depositions (0.40); exchange emails with RSN re possible questions, strategy for ATewfik depo, potential exhibits and prep for same, and review UT documents for possible exhibits (2.70).	10.40				10.40		10.40	4

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RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/20/21	ATewfik depo prep (3.00); take ATewfik deposition (9.00).	12.00	12.00		12.00				4
3/20/21	Exchange emails with RSN re prep for ATewfik depo, possible questions and exhibits, including review of UT production for relevant documents (2.10); attend and record ATewfik depo, including conferring re ATewfik statements and testimony, possible questions, exhibits and strategy (8.30); phone conference(s) with RSN after ATewfik depo re same (0.50).	10.90				10.90		10.90	4
3/21/21	Phone conference(s): with Client re ATewfik depo testimony.	0.10				0.10		0.10	4
3/22/21	R&R of feedback from EN re ATewfik known lies and contradictions with known docs and statements.	1.00	1.00		1.00				4
3/22/21	Draft email to RSN re ATewfik depo testimony and PGlick report.	0.10				0.10		0.10	4
3/23/21	Confer w/ RWS re experts and case next steps.	0.40	0.40		0.40				4
3/23/21	Phone conference(s) with RSN re experts and discovery issues.	0.40				0.40		0.40	4
3/24/21	Exchange emails with OC and RSN re scheduling of depo for GFenves and additional document production (0.20, reduced to 0.00); exchange emails with RSN re "technically early" and UT claim it wanted to stop profs "gaming the system" by going up early with second chance (0.20).	0.20				0.40	0.20	0.20	4
3/24/21	Confer w/ SThompson re report.	0.50	0.50		0.50				4
3/24/21	Work w/ UT on scheduling GFenves deposition dates.	0.00	0.25	0.25	0.00				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/25/21	Phone conference(s) with RSN re SThompson discussions on statistical review of UT tenure data. (0.50); review UT document production for comparator information and emails relating to Client (2.80).	3.30				3.30		3.30	4
3/25/21	R&R UT's production 26705-26886.	1.00	1.00		1.00				4
3/26/21	Phone conference(s) with Client re damages, changing tenure standards and CCAFR appeal issues.	0.50				0.50		0.50	4
3/26/21	Confer w/ RWS re SB report.	0.00	0.20	0.20	0.00				4
3/26/21	Phone conference(s) with Client and RSN re economic damages and possible theories.	0.20				0.20		0.20	4
3/26/21	Confer w/ RWS re SThompson report and his statistical analysis of UT's tenure spreadsheet data.	0.50	0.50		0.50				4
3/27/21	Exchange emails with JHorn re changing tenure standards and trial themes.	0.30				0.30		0.30	4
3/27/21	R&R of JHorn thoughts and analysis on tenure data and EN appeal and CCAFR report.	0.50	0.50		0.50				4
3/29/21	Confer w/ JHorn re his potential deposition.	0.25	0.25		0.25				4
3/29/21	Discuss w/ SThompson re additional information for him to consider or not (0.50) and exchange w/ RWS re SThompson report (0.30).	0.80	0.80		0.80				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/29/21	Discuss w/ RWS SThompson's report and the underlying data and language we need to focus on.	0.30	0.30		0.30				4
3/29/21	Exchange emails with RSN and SThompson re specific information contained in tenure dossiers and locating within UT production.	0.30				0.30		0.30	4
3/30/21	Reschedule GFenves deposition w/ UT for 5/27 (0.25); communicate GFenves depo move to EN (0.10).	0.00	0.35	0.35	0.00				4
3/30/21	Exchange emails with OC re rescheduling of GFenves depo.	0.10				0.10		0.10	4
3/31/21	Exchange emails with Client re GFenves deposition scheduling info.	0.00				0.10	0.10	0.00	4
3/31/21	Communicate w/ SThompson on data missing from UT's production (0.50); seek the missing data from UT as identified by SThompson and explaining the "source" of the missing data (0.25); confer with RWS re expert damages report (0.20).	0.95	0.95		0.95				4
3/31/21	Phone conference(s) with RSN re expert witness report on damages.	0.20				0.20		0.20	4
3/31/21	Phone conference(s) with TGlass re expert report on damages.	0.20				0.20		0.20	4
4/5/21	Legal research re mitigation of damages and virtually identical requirement for replacement position.	2.50				2.50		2.50	4
4/6/21	Phone conference(s) with TGlass re economic damages report and info needed (0.20); exchange emails with TGlass re documents for review for expert report	3.80				3.80		3.80	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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	on damages (0.30); review UT document production, P's document production, and legal research (jury instructions, case law) for documents to provide TGlass relating to economic damages (3.30).								
4/7/21	R&R of CJulien depo transcript and exhibits.	0.10	0.10		0.10				4
4/7/21	Confer w/ RWS re GFenves corp rep topics.	0.20	0.20		0.20				4
4/7/21	Phone conference(s) with RSN re organizational rep topics.	0.20				0.20		0.20	4
4/7/21	Phone conference(s) with TGlass (0.10); exchange emails with OC requesting additional salary information for ECE professors, review UT document production re same, and expert witness deadline extension. (2.10).	2.20				2.20		2.20	4
4/7/21	Agree w/ UT to another 1 week extension on expert reports (0.10); inform experts re same (0.10, reduced to 0.00).	0.10	0.20	0.10	0.10				4
4/7/21	R&R of SWood depo transcript and exhibits, and summarize/take notes.	5.00	5.00		5.00				4
4/8/21	R&R of SWood depo transcript and exhibits, and summarize/take notes.	2.50	3.00	0.50	2.50				4
4/8/21	Phone conference(s) with PGlick re expert report and finalizing same.	0.80				0.80		0.80	4
4/9/21	R&R of UT's merit pay spreadsheet production.	0.50	0.50		0.50				4
4/9/21	Exchange emails with OC and TGlass re production of spreadsheets with ECE salary information and review spreadsheets.	0.40				0.40		0.40	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 76 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
4/9/21	R&R of SWood depo transcript and exhibits, and summarize/take notes.	2.50	3.00	0.50	2.50				4
4/10/21	R&R of CJulien depo transcript and exhibits, and summarize/take notes.	5.50	6.00	0.50	5.50				4
4/11/21	R&R of CJulien depo transcript and exhibits, and summarize/take notes.	2.00	2.00		2.00				4
4/13/21	Phone conference(s) with TGlass re front pay scenarios and draft email re possible comparators (0.40), and with RSN re economic damages and front pay scenarios (0.30).	0.70				0.70		0.70	4
4/13/21	R&R of additional docs sent to SB.	0.00	0.10	0.10	0.00				4
4/14/21	Follow up phone conference(s) with TGlass re expert report.	0.10				0.10		0.10	4
4/14/21	Draft email to and phone conference with Client re expert reports, Client's economic damages and discrepancies between annual salary/W-2s and spreadsheets for UT and review documents re same.	1.80				1.80		1.80	4
4/14/21	Agree w/ UT on another expert report deadline extension to 4/19.	0.10	0.10		0.10				4
4/14/21	Confer w/ RWS and SThompson on his report.	0.50	0.50		0.50				4
4/14/21	Zoom meeting with SThompson and RSN re findings for expert report on statistics re tenure at UT for women profs.	0.50				0.50		0.50	4
4/14/21	Confer w/ RWS and TGlass and SB re reports.	0.00	0.75	0.75	0.00				4
4/14/21	Draft email(s) to and review email(s) from OC re extension of deadline to file	1.00				1.00		1.00	4

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	P's expert reports (0.20); phone conference(s) with RSN and TGlass re economic damages and possible front pay scenarios and review docs re same (0.80).								
4/15/21	R&R of data spreadsheet produced by UT and forward to SB.	0.00	0.10	0.10	0.00				4
4/15/21	Review UT document production and spreadsheets for compensation history of other professors for TGlass and draft email to TGlass re same.	2.40				2.40		2.40	4
4/16/21-1	Phone conference(s) with RSN re discovery of expert draft reports (0.20); review emails from OC re supplemental production of dossiers in response to request and review documents produced to confirm production (0.30).	0.50				0.50		0.50	4
4/16/21-2	Confer w/ RWS re issues with SB.	0.00	0.20	0.20	0.00				4
4/17/21	R&R of additional production from UT re "missing" data identified by SThompson and requested of UT to fill in those blanks and I filled in the blanks and forwarded to SThompson for his use.	1.25	1.50	0.25	1.25				4
4/17/21	Phone conference(s) with TGlass re expert report and calculating front pay economic damages.	0.30				0.30		0.30	4
4/18/21	Phone conference(s) with RSN and TGlass re damages report.	0.40				0.40		0.40	4
4/18/21	Confer with w/ RWS and TGlass re his economic damages report.	0.40	0.40		0.40				4
4/18/21	R&R of SB's draft report (1.00) and confer w/ RWS re same (0.50).	0.00	1.50	1.50	0.00				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
4/18/21	Phone conference with SB and review SB draft report.	0.00				1.80	1.80	0.00	4
4/19/21	Review draft report of SThompson on statistical issue re gender discrimination in tenure at UT and phone conferences and emails with RSN and SThompson re same.	0.90				0.90		0.90	4
4/19/21	Review SB draft report and changes.	0.00				0.60	0.60	0.00	4
4/19/21	Work w/ RWS on preparing expert designations doc including discussion of designating ourselves since we are not producing reports (Doc. 34).	0.50	0.50		0.50				4
4/19/21	R&R of TGlass report and discussion w/ RWS.	0.75	1.00	0.25	0.75				4
4/19/21	Meet w/ SThompson re his report and communication w/ RWS.	0.75	0.75		0.75				4
4/19/21	Phone conference(s): with RSN re expert reports, designation and designating attorneys as experts (Doc. 34) (0.50); draft designation of experts and prepare and finalize reports and exhibits for filing (Doc. 34) (0.50).	1.00				1.00		1.00	4
4/19/21	Review TGlass report on economic damages and phone conferences and emails with TGlass and RSN re same.	2.10				2.10		2.10	4
4/19/21	R&R of SB's new draft.	0.00	1.00	1.00	0.00				4
4/20/21	R&R of ATewfik depo transcript and exhibits, and summarize/take notes.	5.00	5.00		5.00				4
4/20/21	Confer w/ RWS and EN and JHorn re expert reports	1.00	1.00		1.00				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
4/20/21	Draft email to Client re expert reports and designation.	0.10				0.10		0.10	4
4/21/21	R&R of ATewfik depo transcript and exhibits, summarize/take notes.	4.00	5.00	1.00	4.00				4
4/22/21	R&R of ATewfik depo transcript and exhibit, and summarize/take notes.	2.50	3.00	0.50	2.50				4
4/26/21	Confer w/ RWS and SThompson re report, documents relied upon, and amendment of report.	0.30	0.30		0.30				4
4/26/21	R&R of UT's request for supporting spreadsheet relied upon by SThompson.	0.10	0.10		0.10				4
4/26/21	Phone conference(s) with RSN and SThompson re report, documents relied upon, and amendment of report.	0.30				0.30		0.30	4
4/27/21	Draft email(s) to and review email(s) from RSN re discovery deadline and final RFPs to UT.	0.20				0.20		0.20	4
4/27/21	Confer w/ RWS re any potential discovery requests and debating options due to one month point prior to deadline.	0.20	0.20		0.20				4
4/27/21	Draft email(s) to and review email(s) from OC re production of documents relied upon by TGlass and SThompson.	0.30				0.30		0.30	4
4/28/21	R&R of RWS's 3rd RFPs.	0.50	0.50		0.50				4
4/28/21	Review UT's document production to determine additional documents needed and draft P's Third RFP to UT relating to pregnancy extension of MT, equity	3.70				3.70		3.70	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	salary review and ZH tenure review and take notes re same.								
5/3/21	Draft email(s) to and review email(s) from RSN re email of OC relating to outstanding discovery issues.	0.10				0.10		0.10	4
5/3/21	Schedule meeting w/ RWS on UT's latest outstanding discovery communication issues.	0.00	0.10	0.10	0.00				4
5/4/21	R&R of SWood errata sheet.	0.25	0.25		0.25				4
5/4/21	R&R of CJulien errata sheet.	0.25	0.25		0.25				4
5/5/21	Review errata sheets of CJulien and SWood.	0.00				0.30	0.30	0.00	4
5/6/21	Draft email(s) to and review email(s) from Client re possible deposition schedule/dates and need to search for additional documents responsive to UT's document requests (0.30); draft email(s) to and review email(s) from OC re scheduling depositions, supplemental document production, dispositive motion deadline and case schedule (0.40, reduced to 0.30); phone call w RSN re outstanding written discovery, deposition schedule, deposition topics for organizational representatives, and possible schedule extensions (0.80).	1.40				1.50	0.10	1.40	4
5/6/21	Confer w/ RWS re UT's proposals moving forward (0.80); R&R and edit RWS's draft response to UT's litigation schedule proposals/changes (0.75).	1.55	1.55		1.55				4
5/7/21	Draft email(s) to and review email(s) from Client re possible deposition dates/schedule and search for additional responsive documents to produce to UT	0.10				0.20	0.10	0.10	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	and take notes re same.								
5/7/21	Confer w/ RWS and EN re EN's depo scheduling.	0.25	0.25		0.25				4
5/10/21	Draft email(s) to and review email(s) from Client re potential witness Mary Eberlein.	0.30				0.30		0.30	4
5/10/21	Research on gender bias in academia in general and at UT in particular.	1.00	1.00		1.00				4
5/11/21	Confer w/ RWS and EN re a potential witness ME (0.50); confer w/ RWS and UT re follow-up list of documents (0.50); R&R of RWS's follow up list of docs we're looking for from UT (0.10).	0.70	0.70		0.70				4
5/11/21	Continue to review UT document production and P's discovery requests to determine additional documents to be produced and take notes re same (2.10); phone conference(s) with RSN and OC re discovery issues and supplemental documents to be produced (0.50); draft email to OC re additional documents to be produced (0.50); continue to review UT document production to determine missing documents requested in P's RFPs to request supplementation of discovery (4.60).	7.70				7.70		7.70	4
5/12/21	Phone conference(s) with OC re supplementing document production.	0.60				0.60		0.60	4
5/14/21	Review UT's document production for emails and other documents relevant to case, take notes and save for later use.	1.70				1.70		1.70	4
5/14/21	Draft email(s) to and review email(s) from OC re request for UT to supplement	0.30				0.30		0.30	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	and comply with RFPs re gender bias and discrimination and request for extension of D's expert witness deadlines.								
5/14/21	Agree to extend UT's expert deadline from 5/17 to 5/24.	0.00	0.10	0.10	0.00				4
5/14/21	Seek clarification/designation from UT of corp rep topics assigned to which witnesses: GFenves, CShockley, or JSpeitel?	0.25	0.25		0.25				4
5/17/21	R&R of detailed corp rep designations of topics to GFenves, CShockley, JDalton, and JSpeitel and confer w/ RWS and EN re same.	0.50	0.50		0.50				4
5/18/21	Draft and serve GFenves, CShockley, JSpeitel, and JDalton depo notices.	0.25	0.25		0.25				4
5/21/21	Phone conference(s) with RSN re deposition strategy, possible exhibits for GFenves, CShockley and JSpeitel depositions.	0.70				0.70		0.70	4
5/21/21	Confer w/ RWS re GFenves and remaining depositions.	0.70	0.70		0.70				4
5/21/21	R&R of multiple docs suggested by RWS for GFenves and remaining depositions.	2.50	3.00	0.50	2.50				4
5/21/21	Draft and serve amended CShockley and JSpeitel depo notices.	0.10	0.10		0.10				4
5/21/21	Draft email(s) to and review email(s) from RSN re possible exhibits for GFenves, CShockley and JSpeitel depositions.	0.20				0.20		0.20	4
5/24/21	Review policies for corp rep topics and note questions for each particular rep.	2.50	3.00	0.50	2.50				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
5/24/21	R&R of UT's expert designation and report (Doc. 35); communicate w/ experts to alert them to UT's experts and deadline to rebut if we think it advisable (0.10).	2.10	2.10		2.10				4
5/24/21	Draft email(s) to and review email(s) from RSN re locating documents for depositions including discrimination policies.	0.20				0.20		0.20	4
5/25/21	Review UT document production for documents to be used in GFenves, Shockley and Speitel depositions.	3.10				3.10		3.10	4
5/25/21	Draft email(s) to and review email(s) from RSN re depo prep and discrimination policies at UT.	0.20				0.20		0.20	4
5/25/21	R&R of production docs (emails and reports and spreadsheets and dossiers) in preparation for depositions and contrasting depositions of SWood and CJulien and AT	5.50	6.00	0.50	5.50				4
5/25/21	Legal research on expert witness rebuttal via cross-examination or expert report rebuttal (1.00), and confer w/ RWS re same (0.50).	1.50	1.50		1.50				4
5/26/21-1	R&R of production docs (emails and reports and spreadsheets and dossiers) in preparation for upcoming depositions and contrasting depositions of SWood and CJulien and ATewfik and drafting questions w/ document cross referencing (7.50, reduced to 6.50) and conferring w/ RWS (1.50).	8.00	9.00	1.00	8.00				4
5/26/21-2	Phone conference(s) with RSN re GFenves deposition and possible exhibits and lines of questioning.	0.80				0.80		0.80	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
5/26/21-3	Draft email(s) to and review email(s) from RSN and Client re documents and possible questions for use in GFenves, Shockley and Speitel depositions.	0.70				0.70		0.70	4
5/26/21-4	Review UT document production for relevant documents for GFenves, Shockley and Speitel depositions, including drafting spreadsheet re comparators.	8.20				9.20	1.00	8.20	4
5/26/21-5	Draft email(s) to and review email(s) from OC re "tenure roadshow" documents.	0.10				0.10		0.10	4
5/27/21-1	GFenves depo prep (2.30); take GFenves deposition (8.00); confer re same w/ RWS and EN (0.70).	11.00	11.00		11.00				4
5/27/21-2	Prepare for CShockley depo tomorrow.	1.75	2.00	0.25	1.75				4
5/27/21-4	Draft email(s) to and review email(s) from RSN before GFenves depo re possible exhibits, including review of UT production for relevant documents.	0.50				0.50		0.50	4
5/27/21-5	Attend and record deposition of GFenves, including conferring with RSN re witness's responses, possible questions, and exhibits (8.00); phone conference(s) with RSN following GFenves depo re same and best point/answers from depo (0.70).	8.70				8.70		8.70	4
5/28/21-1	CShockley depo prep (1.00); take CShockley deposition (4.40); JSpeitel depo prep (2.00, reduced to 1.75); take JSpeitel deposition (2.60); confer after w/ RWS and EN (1.00).	10.50	10.75	0.25	10.50				4
5/28/21-2	Attend and record deposition of Jerry Speitel, including conferring with RSN re witness's responses, possible questions, and exhibits (2.60); attend and record	8.10				8.10		8.10	4

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	deposition: Carmen Shockley, including conferring with RSN re witness's responses, possible questions, and exhibits (4.40); phone conference(s) with RSN and Client re depositions of Shockley, Speitel and GFenves (1.00); draft email(s) to and review email(s) from OC re request for extension of responses to document requests (0.10).								
6/1/21	Draft email to TGlass re deposition preparation.	0.10				0.10		0.10	4
6/1/21	R&R of UT's responses to 2nd RFPs.	0.50	0.50		0.50				4
6/1/21	R&R UT's production 33869-34067.	0.10	0.10		0.10				4
6/2/21	R&R UT's production 33869-34067.	1.00	1.00		1.00				4
6/3/21	Draft email to TGlass re preparation for deposition.	0.10				0.10		0.10	4
6/4/21	Confer w/ RWS and EN re report and depo.	0.75	0.75		0.75				4
6/4/21	Phone conference(s) with Client and RSN re upcoming depositions, document production issues, experts and mental health issues relating to tenure denial.	0.70				0.70		0.70	4
6/4/21	Work on deposition dates for UT's request for EN, and TGlass, SThompson, and PGlick.	0.00	0.25	0.25	0.00				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/7/21	Confirm and forward JDalton depo link w/ RWS and EN for 6/9 (0.25, reduced to 0.00); prep for JDalton depo - review of policies, preparing questions and cross referencing production for exhibits (5.00, reduced to 4.50); R&R of EN's medical release so that RWS and I can speak to therapist about EN. (0.10, reduced to 0.00); confer w/ RWS and therapist re EN and the issue of whether the therapist should testify or not (0.50).	5.00	5.85	0.85	5.00				4
6/7/21	Draft email to TGlass re deposition dates (0.10, reduced to 0.00); review UT document production of 6/1/21, make notes re same and save for future use (3.30).	3.30				3.40	0.10	3.30	4
6/8/21-1	Propose depo schedule to UT (0.10); ask EN for assistance locating additional policies for JDalton depo tomorrow (0.25); test technology with the Court reporter in prep for the JDalton depo tomorrow (0.25, reduced to 0.00); JDalton depo prep - reviewing additional policies and HR trainings and preparing questions (3.50, reduced to 3.00).	3.35	4.10	0.75	3.35				4
6/8/21-2	Confer w/ RWS and SThompson re report and deposition (0.40); confer w/ RWS and TGlass re his expert report (0.30), and w/ RWS re: docs for use in the JDalton depositions (0.20).	0.90	0.90		0.90				4
6/8/21-3	Phone conference(s) with TGlass and RSN re Defendant's expert report (0.30); phone conference(s) with RSN and SThompson re upcoming deposition and expert report (0.40); phone conference(s) with RSN re UT document production and deposition of JDalton (0.20).	0.90				0.90		0.90	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/8/21-5	Review UT document production for documents relating to JDalton depo, including discrimination policies and take notes and draft emails to RSN re same (2.80); review defendant's expert report and comparator information produced by UT and draft email to RSN re same (1.30).	4.10				4.10		4.10	4
6/9/21-1	JDalton depo prep (2.80); take JDalton deposition (4.00); post-depo discussion re same w/ RWS (0.20).	7.00	7.00		7.00				4
6/9/21-2	Review UT document production and website for UT discrimination policies for JDalton deposition (0.30); attend and record JDalton deposition, including conferral with RSN re witness's responses, possible questions, and exhibits (4.00); phone conference(s) with RSN following deposition re depo points and evidence (0.20).	4.50				4.50		4.50	4
6/11/21	R&R of the ATewfik depo cert.	0.10	0.10		0.10				4
6/15/21	Work on scheduling remaining depositions for UT.	0.00	0.25	0.25	0.00				4
6/15/21	Phone conference(s) with PGlick re possible deposition.	0.30				0.30		0.30	4
6/15/21	Phone conference(s) with TGlass re deposition.	0.10				0.10		0.10	4
6/15/21	Draft email(s) to and review email(s) from: TGlass and RSN re proposed deposition by UT.	0.40				0.40		0.40	4
6/16/21	Confer w/ RWS re charging UT for expert depositions.	0.10	0.10		0.10				4

1. Pre-Suit

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/16/21	Review GFenves depo transcript and summarize/take notes.	5.00	5.00		5.00				4
6/16/21	Phone conference(s) with OC re discovery and outstanding case issues.	0.30				0.30		0.30	4
6/16/21	Draft email(s) to and review email(s) from OC and RSN re possible deposition dates, document production, and payment by UT of expert depo fees and legal research re same.	1.30				1.30		1.30	4
6/17/21	R&R UT's production 34068-34969.	0.10	0.10		0.10				4
6/17/21	Phone conference(s) with OC re scheduling depositions of experts and payment by UT of fees for same, and depo of Client.	0.30				0.30		0.30	4
6/17/21	Advise EN on interacting w/ UT re criminal background check.	0.25	0.25		0.25				4
6/17/21	R&R of UT's SThompson depo notice (0.10); forward same to SThompson (0.10, reduced to 0.00).	0.10	0.20	0.10	0.10				4
6/18/21	R&R UT's production 34068-34969.	3.50	4.00	0.50	3.50				4
6/18/21	Draft email(s) to and review email(s) from Client, RSN and TGlass re upcoming depositions.	0.30				0.30		0.30	4
6/18/21	Finalize schedule and working out prep schedule for the rest of the deposition.	0.00	0.25	0.25	0.00				4
6/19/21	Discuss w/ RWS and EN depo protocols for EN and other preparation issues for EN's depo.	0.50	0.50		0.50				4

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/19/21	Review client docs for production to UT and draft emails to Client and RSN re same and upcoming depositions.	2.90				2.90		2.90	4
6/19/21	R&R UT's production 34068-34969.	3.50	3.50		3.50				4
6/20/21	R&R UT's production 34068-34969.	2.50	3.00	0.50	2.50				4
6/20/21	Confer w/ RWS re proposed production to UT.	0.50	0.50		0.50				4
6/20/21	Phone conference(s) with RSN re preparing Client for deposition and production of Client documents.	0.20				0.20		0.20	4
6/20/21	Draft email(s) to and review email(s) from RSN and Client re Client's upcoming depo and depo prep.	0.20				0.20		0.20	4
6/20/21	Review Client documents for production to UT and draft emails to and review emails from Client and RSN re same.	6.10				6.10		6.10	4
6/21/21	Review client documents for production and draft emails to client and RSN re same (7.70, reduced to 6.70); draft letter to OC re document production (0.20).	6.90				7.90	1.00	6.90	4
6/21/21	Depo prep with Client and RSN.	3.00				3.20	0.20	3.00	4
6/21/21	Meet w/ EN and RWS to prepare for EN's deposition.	3.00	3.20	0.20	3.00				4
6/21/21	Review expert reports of TGlass and of UT expert for TGlass depo Wednesday.	1.00				1.00		1.00	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/22/21	Confer w/ SThompson, and R&R of Stata data files from SThompson's report that BDower had requested and send those files to BDower.	1.00	1.00		1.00				4
6/22/21	R&R of JDalton depo transcript and exhibits, summarizing and creating notes.	2.00	2.00		2.00				4
6/22/21	R&R of UT's depo notices.	0.10	0.10		0.10				4
6/22/21	SThompson depo prep (1.00); SThompson deposition (1.60); post-depo discussion re same w/ RWS (0.50).	2.75	2.75		2.75				4
6/22/21	R&R UT's production 34068-34969.	1.50	2.00	0.50	1.50				4
6/22/21	Phone conference(s) with OC re P's production of documents.	0.10				0.10		0.10	4
6/22/21	Phone conference(s) with RSN re preparation of Client for depo, depo of TGlass, and production of Client documents (1.00); phone conference(s) with RSN and TGlass re preparation for TGlass depo (0.60); phone conference(s) with Client and RSN re depositions (0.40).	2.00				2.00		2.00	4
6/22/21	Attend and co-defend deposition: of SThompson, including phone conferences with witness and RSN and draft emails to same re same.	1.60				1.60		1.60	4
6/22/21	Legal research re studies showing retirement age of tenured professors and draft emails to TGlass and RSN re same and supporting Client's claim for damages to age 70 (2.50); review emails and documents provided by Client for production to UT and draft emails re same to RSN and Client (5.60).	8.10				8.10		8.10	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/23/21-1	TGlass depo prep (0.50); TGlass depo (1.50).	2.00	2.00		2.00				4
6/23/21-2	R&R of CShockley depo, summarizing and taking notes (2.50) and same of JSpeitel depo (3.00); depo prep w/ RWS and EN (2.40).	7.90	7.90		7.90				4
6/23/21-3	R&R of CShockley errata sheet (0.10); R&R of JSpeitel errata sheet (0.50).	0.60	0.60		0.60				4
6/23/21-4	Review reports of UT expert and of TGlass report to prepare for TGlass depo, and client documents to prepare client for client's depo (1.00); in-person conference with Client and RSN re depo prep (2.40); attend, record and defend deposition of TGlass, including conferral with co-counsel (1.50).	4.90				4.90		4.90	4
6/23/21-5	Review documents provided by Client, prepare for production and draft email producing same to OC.	3.40				3.40		3.40	4
6/24/21	R&R of new production to UT.	0.10	0.10		0.10				4
6/25/21	R&R of EN document production to RWS and me.	3.50	4.00	0.50	3.50				4
6/25/21	Review P's interrogatory response, depo transcripts and UT document production including info re comparators, payroll spreadsheets, etc. and draft supplemental interrogatory responses and email to RSN re same.	3.60				3.60		3.60	4
6/25/21	Review case documents, including UT document production and Client's appeals and statements in case, and draft emails to Client and RSN re same in preparation for Client deposition.	2.60				2.60		2.60	4

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/25/21	Draft email(s) to and review email(s) from OC re deposition dates, extension of discovery deadlines, dispositive motion deadline, and payment of fees for expert witness depositions.	0.00				0.20	0.20	0.00	4
6/25/21	Phone conference(s) with potential witness Mary Eberlein re environment in ECE department and potential examples of gender/pregnancy discrimination and draft email to Client and RSN re same.	0.40				0.80	0.40	0.40	4
6/25/21	Review Client documents for production to UT.	1.30				1.30		1.30	4
6/26/21	Exchange emails with Client re possible witnesses, including Mattan Erez, JValvano and Sarfraz Khurshid.	0.30				0.30		0.30	4
6/26/21	Legal research on damages to EN re UT's actions in prep for deposition.	1.50	1.50		1.50				4
6/27/21	Review Client documents including text messages and student evaluations and send email to OC with supplemental document response.	1.20				1.20		1.20	4
6/28/21	Exchange emails with Client and RSN re deposition thoughts, and confer with RSN re same	2.10				2.10		2.10	4
6/28/21	Confer w/ RWS and EN re depo prep (2.50, reduced to 2.00); follow-up advice for EN re depo tomorrow (1.50, reduced to 1.25).	3.25	4.00	0.75	3.25				4
6/28/21	Continue review of P's interrogatory responses, depo testimony and UT document production and finalize first supplemental interrogatory responses and email to OC re same.	3.10				3.10		3.10	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/28/21	R&R and editing of RWS's draft of supplemental interrogatory responses.	1.50	1.50		1.50				4
6/28/21	Phone conference(s) with RSN re Client deposition tomorrow.	0.10				0.10		0.10	4
6/29/21-1	In-person conference with Client and RSN before deposition re Client's deposition (1.00); defend deposition of Client, including conferring with Client and RSN re same and possible objections, etc. (9.00); confer after with RSN re same and case strategy, to do going forward (1.00, reduced to 0.70).	10.70				11.00	0.30	10.70	4
6/29/21-2	EN depo prep (1.00); EN deposition (9.00); post-depo discussion with RWS (1.00, reduced to 0.75).	10.75	11.00	0.25	10.75				4
6/30/21	Phone conference(s) with Client re UT document production including documents relating to Mohit Tiwari's late rescinding of probationary extension.	0.40				0.40		0.40	4
6/30/21	Confer w/ RWS and EN re MTiwari's very late rescission of his probationary extension compared w/ EN's experience.	0.50	0.50		0.50				4
6/30/21	Review UT document production re issues referred to in EN depo, documents re Mohit Tiwari rescission, and additional documents needed from UT.	3.00				3.40	0.40	3.00	4
7/1/21	Phone conference(s) with opposing counsel re remaining discovery issues, including production of documents privilege logs and depositions.	0.40				0.40		0.40	4
7/2/21	R&R UT's production 34970-37788.	3.00	3.00		3.00				4
7/2/21	R&R of UT's supplemental discovery responses.	0.50	0.50		0.50				4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
7/2/21	Draft email(s) to and review email(s) from OC re extending deadline for disclosures and confirming agreements from yesterday re discovery.	0.20				0.20		0.20	4
7/2/21	Confer w/ RWS re UT's supplemental responses and production.	0.50	0.50		0.50				4
7/3/21	R&R UT's production 34970-37788.	4.50	5.00	0.50	4.50				4
7/5/21	R&R UT's production 34970-37788.	4.50	5.00	0.50	4.50				4
7/6/21	Review, draft and finalize P's amended disclosures and email to OC.	1.30				1.30		1.30	4
7/6/21	R&R UT's production 34970-37788.	2.50	3.00	0.50	2.50				4
7/6/21	Draft email(s) to and review email(s) from: Client re contact information and names and information re potential witnesses for inclusion in P's amended disclosures, including students and potential witnesses re damages and what those witnesses might say.	0.70				0.70		0.70	4
7/6/21	R&R of SThompson transcript, summarizing and taking notes.	2.50	2.50		2.50				4
7/6/21	Phone conference(s) with Client re UT document production and tenure procedures.	0.40				0.40		0.40	4
7/7/21	Draft email(s) to and review email(s) from PGlick re deposition scheduling.	0.00				0.10	0.10	0.00	4
7/8/21	Review Client documents for production to UT and UT document production and draft email to Client re same.	2.50				2.50		2.50	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
7/8/21	R&R UT's production 34970-37788.	2.50	3.00	0.50	2.50				4
7/9/21	R&R of TGlass transcript.	1.50	1.50		1.50				4
7/12/21	Confer w/ RWS re agreeing to put off PGlick depo by UT past the MSJ on an if-needed basis.	0.25	0.25		0.25				4
7/14/21	Exchange emails with OC and RSN re request from OC to delay taking PGlick's deposition and Client's ADA request for leave; review email from Client's spouse re UT training on sensitive information.	0.50				0.50		0.50	4
7/14/21	Discuss w/ RWS agreement w/ UT to put off PGlick depo to the future, if needed.	0.10	0.10		0.10				4
7/16/21	Review Client documents to be produced to UT, including emails, video of lectures and review of prior productions to eliminate duplicates and review of Client emails discussing same, and draft emails to Client and OC re same	3.10				4.10	1.00	3.10	4
7/16/21	Confer w/ RWS re supplementing production to UT re EN's additional docs.	0.50	0.50		0.50				4
7/16/21	R&R of EN's recorded lectures and additional potential production.	4.00	5.00	1.00	4.00				4
7/17/21	Continue reviewing Client emails, video lectures and documents for production to UT and draft email to Client er same.	4.50				6.50	2.00	4.50	4
7/19/21	Finish review for production of Client emails, documents, videos of lectures to UT and draft emails to OC and Client re same.	3.30				3.80	0.50	3.30	4

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
7/21/21	Confer w/ RWS re therapist notes for production in the case.	0.25	0.25		0.25				4
7/26/21	R&R of CShockley depo cert, GFenves depo cert, and JDalton depo cert.	0.10	0.10		0.10				4
7/27/21	R&R of EN depo transcript, summarizing and taking notes.	4.50	5.00	0.50	4.50				4
7/28/21	Continue R&R of EN depo transcript, summarizing and taking notes.	2.00	2.00		2.00				4
8/4/21	R&R EN's proposed errata changes.	0.50	0.50		0.50				4
8/6/21	Discuss w/ RWS and EN re errata sheet.	0.20	0.20		0.20				4
8/6/21	Exchange emails with RSN and Client re review of Client's deposition transcript and possible corrections to same.	0.20				0.20		0.20	4
8/6/21	R&R of SThompson deposition cert.	0.10	0.10		0.10				4
8/16/21	R&R of JSpeitel and TGlass certs.	0.10	0.10		0.10				4
8/20/21	Discuss further w/ RWS and EN clarification of errata issues for EN's depo.	0.25	0.25		0.25				4
8/20/21	Draft email(s) to and review email(s) from: RSN re depo changes to Client's depo transcript (0.20); Phone conference(s) with Client re same (0.50).	0.70				0.70		0.70	4
8/23/21	Draft declaration for depo corrections and emails to and review emails from Client re same.	0.30				0.30		0.30	4
8/24/21	Review Client's deposition and suggested deposition changes, draft emails to	1.60				2.00	0.40	1.60	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	and review emails from RSN re same and prepare errata sheet.								
8/25/21	Continue reviewing Client's deposition and suggested deposition changes, draft emails to and review emails from RSN re same and prepare errata sheet.	0.40				0.40		0.40	4
8/26/21	Finalize Client's errata sheet/depo corrections, including emails with court reporter and Client re same, and email to Client re MSJ schedule.	0.70				0.70		0.70	4
9/1/21	Exchange emails with TGlass re deposition invoices and fees.	0.00				0.20	0.20	0.00	4
9/14/21	Exchange emails with OC re motion to exceed page limits for MSJ and plaintiff's response (Doc. 37).	0.10				0.10		0.10	4
9/17/21	Phone conference(s) with RSN re UT's late production of document.	0.10				0.10		0.10	4
10/1/21	R&R of UT's request for PGlick depo.	0.10	0.10		0.10				4
10/1/21	Exchange emails with OC re deposition of PGlick.	0.10				0.10		0.10	4
10/4/21	Phone conference(s) with PGlick re deposition (0.30); phone conference(s) with RSN re PGlick depo and MSJ response (0.20); exchange emails with OC re deposition of PGlick (0.30).	0.80				0.80		0.80	4
10/6/21	Exchange emails with OC re depo notice of PGlick, and with client re declaration.	0.20				0.20		0.20	4
10/8/21	Exchange emails with OC re reimbursement for expert witness deposition fees.	0.10				0.10		0.10	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/14/21	Draft email to OC re additional client document possibly not produced earlier.	0.20				0.20		0.20	4
10/25/21	Draft email to PGlick re depo notice.	0.10				0.10		0.10	4
10/26/21	Phone conference(s) with RSN and Client re D's MSJ, Order on trial resetting, and deposition of PGlick	1.10				1.10		1.10	4
10/30/21	Phone conference(s) with PGlick re deposition prep.	1.20				1.20		1.20	4
11/1/21	Confer w/ PGlick and RWS re PGlick depo and UT MSJ.	0.50	0.50		0.50				4
11/1/21	Phone conference(s) with PGlick re depo prep.	0.50				0.50		0.50	4
11/1/21	Phone conference(s) with RSN re PGlick depo.	0.10				0.10		0.10	4
11/2/21	Draft email to PGlick re documents for review.	0.20				0.20		0.20	4
11/4/21	Exchange emails with PGlick re case documents for review and deposition tomorrow (0.20); Phone conference(s) with PGlick re prep for depo tomorrow (0.70).	0.90				0.90		0.90	4
11/5/21	PG depo prep (1.00); PGlick deposition (7.00).	8.00	8.00		8.00				4
11/5/21	Attend and co-defend deposition of PGlick including phone conferences with PGlick and RSN on breaks, before, and after depo.	7.60				7.60		7.60	4
11/8/21	R&R of UT's request for a rush transcript of PGlick depo	0.10	0.10		0.10				4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
11/10/21	R&R of PGlick depo transcript.	3.50	4.00	0.50	3.50				4
11/10/21	Exchange emails with PGlick re review of depo transcript.	0.10				0.10		0.10	4
11/11/21	Exchange emails with RSN re deposition transcripts and videos of experts.	0.20				0.20		0.20	4
11/12/21	Review errata sheet for PGlick's depo.	0.10				0.10		0.10	4
12/6/21	R&R of PGlick depo cert.	0.10	0.10		0.10				4
12/16/21	Exchange emails with TGlass and SThompson re fees for depositions.	0.00				0.50	0.50	0.00	4
1/5/22	R&R of invoices to UT re expert depositions taken by UT.	0.00	0.10	0.10	0.00				4
1/5/22	Draft email to OC re reimbursement of expert witness deposition fees, including review, selection of appropriate fees/hours, and compilation of expert bills and legal research re reimbursement of same.	1.10				1.10		1.10	4
1/14/22-1	Review letter from OC and exchange emails with OC and RSN re reimbursement of expert witness deposition fees.	0.40				0.40		0.40	4
1/14/22-2	R&R efforts to get EN's experts paid by UT for UT's depositions of EN's experts.	0.00	0.10	0.10	0.00				4
2/3/22	Review and compile documents for supplemental production (1.30); draft Second Amended Disclosures and email to OC re supplemental production (0.40); review proposed voir dire questions (0.30) and draft email to RSN re same (0.20).	2.20				2.20		2.20	4

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/3/22	R&R of RWS supplementing production to UT re EN's additional docs, and email voir dire	0.20	0.20		0.20				4
4/4/22	Phone conference(s) with PGlick re expert witness fees.	0.30				0.30		0.30	4
	<b>Phase 4 Totals</b>	<b>982.55</b>	<b>593.80</b>	<b>93.15</b>	<b>500.65</b>	<b>540.20</b>	<b>58.30</b>	<b>481.90</b>	
7/15/20-3	R&R of UT's motion to dismiss first amended complaint (Doc. 22) (1.00) confer w/ RWS on MTD (Doc. 22) (0.50); R&R of correction of MTD to partial MDT (0.10) (all reduced to 0.00).	0.00	1.60	1.60	0.00				6
7/17/20	Confer w/ RWS about the MTD (Doc. 22).	0.00	0.50	0.50	0.00				6
7/17/20	Exchange emails with RSN re Motion to Dismiss (Doc. 22) and Client questions re discovery and trial schedule.	0.00				0.20	0.20	0.00	6
7/20/20	Review email(s) from RSN re UT's Motion to Dismiss and legal arguments (Doc. 22).	0.00				0.20	0.20	0.00	6
7/22/20	Exchange emails with Client and RSN re UT's Motion to Dismiss (Doc. 22) and requesting additional details re same for second amended complaint.	0.00				0.30	0.30	0.00	6
7/22/20	Confer w/ RWS and EN re our response to UT's Partial MTDDismiss (Doc. 22).	0.00	0.75	0.75	0.00				6
7/23/20	Legal research re UT's motion to dismiss and review emails from Client re same (Doc. 22).	0.00				0.50	0.50	0.00	6

1. Pre-Suit

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

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11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
7/24/20	Comment on our response to UT's partial MTD and suggestions for response (Doc. 24).	0.00	1.00	1.00	0.00				6
7/24/20	Legal research re responding to the partial MTD (Doc. 24).	0.00	1.00	1.00	0.00				6
7/24/20	Exchange emails with RSN and Client re response to D's Motion to Dismiss and legal research re same (Doc. 24).	0.00				0.40	0.40	0.00	6
7/27/20	Review partial MTD and send draft responses (Doc. 24).	0.00	1.50	1.50	0.00				6
7/27/20	Exchange emails with RSN re response to D's Motion to Dismiss (Doc. 24).	0.00				0.20	0.20	0.00	6
7/28/20	R&R and suggested edits following EN's comments re response to the partial MTD (Doc. 24).	0.00	1.00	1.00	0.00				6
7/28/20	Review UT's Motion to Dismiss Equal Pay Act claim (Doc. 21) and legal research and draft response re same (Doc. 24), including drafting of second amended complaint with additional factual information re pay and draft emails to and review emails from Client and RSN (3.80) and phone conference with Client re same (0.30).	0.00				4.10	4.10	0.00	6
7/29/20	Confer w/ RWS re our response and changes and research issues to include in the response to the MTD (Doc. 24).	0.00	1.50	1.50	0.00				6
7/29/20	Continue legal research and drafting response to UT's motion to dismiss Equal Pay Act claim (Doc. 24), including drafting of second amended complaint and emails to Client and RSN re same.	0.00				7.60	7.60	0.00	6

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
8/5/20	R&R of UT's reply on MTD (Doc. 25).	0.00	0.30	0.30	0.00				6
8/6/20	Confer w/ RWS and EN re UT's reply on MTD (Doc. 25).	0.00	0.40	0.40	0.00				6
8/6/20	Phone conference(s) with Client and JHorn re motion to dismiss (Doc. 22) and expert witnesses (0.30, reduced to 0.00); review UT's reply to motion to dismiss and draft emails to and review emails from RSN re same (Doc. 25) (0.40, reduced to 0.00).	0.00				0.70	0.70	0.00	6
11/2/20	R&R of text order referring MTD (Doc. 22) to Magistrate Judge.	0.00	0.10	0.10	0.00				6
11/13/20	R&R of Magistrate's R&R on MTD (Doc. 28).	0.00	1.00	1.00	0.00				6
11/13/20	Review report and recommendation on motion to dismiss equal pay claim (Doc. 28).	0.00				0.30	0.30	0.00	6
11/14/20	Explain R&R on MTD to EN (Doc. 28).	0.00	0.50	0.50	0.00				6
12/4/20	R&R of order adopting Mag's R&R on MTD (Doc. 32).	0.00	0.10	0.10	0.00				6
	<b>Phase 6 Totals</b>	<b>0.00</b>	<b>11.25</b>	<b>11.25</b>	<b>0.00</b>	<b>14.50</b>	<b>14.50</b>	<b>0.00</b>	
8/25/21	Confer w/ RWS re filing our own MSJ or not.	0.20	0.20		0.20				7
8/25/21	Phone conference(s) with RSN re Client depo corrections/errata sheet and possibly filing MSJ for plaintiff.	0.20				0.20		0.20	7
9/21/21	R&R of Notice of Correction re UT's motion to exceed pages on MSJ.	0.00	0.10	0.10	0.00				7

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7. MSJ

8.1 Trial Prep

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/21/21	R&R of UT's MSJ (Doc. 38).	2.00	3.00	1.00	2.00				7
9/22/21	Review emails from OC re motion to exceed page limits (Doc. 37) and Court's order denying in part same.	0.20				0.20		0.20	7
9/23/21	R&R of UT's MSJ and taking notes for research topics, evidence checks, and strategy for approach on response (Doc. 44).	4.50	5.00	0.50	4.50				7
9/24/21	Legal research on UT's MSJ - case cite verification, shepardizing, and distinguishing (Doc. 38).	4.50	5.00	0.50	4.50				7
9/29/21	Exchange emails with OC re D's MSJ and page limitations.	0.10				0.10		0.10	7
9/29/21	R&R of new "leaner" version of its MSJ (Doc. 39).	1.50	1.50		1.50				7
9/29/21	Review D's MSJ (Doc. 39).	0.20				0.20		0.20	7
10/4/21	Exchange emails with Client re MSJ and response and Client declaration (0.30); draft Client declaration for possible inclusion with response to MSJ and email to Client re same (0.40).	0.70				0.70		0.70	7
10/7/21	R&R of EN draft declaration (Docs. 42, 44).	0.25	0.25		0.25				7
10/7/21	Begin drafting MSJ response including legal research, review of depo transcripts and document production and draft email to Client re same (Doc. 42, 44).	3.10				3.10		3.10	7
10/8/21	Continue drafting response to MSJ, including legal research, review of depo transcripts and document production (Docs. 42, 44).	5.30				5.30		5.30	7

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/9/21	Continue drafting response to MSJ, including legal research and review of depo transcripts and document production and draft email to Client re same (Docs. 42, 44).	6.70				6.70		6.70	7
10/11/21	Phone conference(s) with RSN re MSJ response (Docs. 42, 44).	0.20				0.20		0.20	7
10/12/21	Continue drafting P's response to D's MSJ, including legal research, review of deposition transcripts and document production for relevant evidence, drafting emails to and review emails from Client re same (Docs. 42, 44).	9.60				9.60		9.60	7
10/14/21	Continue drafting P's response to D's MSJ, including legal research, review of deposition transcripts and document production for relevant evidence, drafting emails to and review emails from RSN and Client re same (Docs. 42, 44).	6.50				6.50		6.50	7
10/14/21	Edit Fact section of RWS's draft MSJ response to reduce page count and tighten section (Docs. 42, 44).	5.00	5.00		5.00				7
10/15/21	Reach agreement with BDower on ability to use late produced document in MSJ response.	0.10	0.10		0.10				7
10/15/21	Edit/draft fact section and cite to record docs (Docs. 42, 44).	5.00	6.00	1.00	5.00				7
10/15/21	Phone conference(s) with RSN re MSJ response (Docs. 42, 44).	0.10				0.10		0.10	7
10/15/21	Continue drafting P's response to D's MSJ, including legal research, review of deposition transcripts and document production for relevant evidence, drafting emails to and review emails from RSN and Client re same (Docs. 42, 44).	7.50				7.50		7.50	7

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/17/21	Exchange emails with RSN re review and edits on response to MSJ draft (Docs. 42, 44).	0.30				0.30		0.30	7
10/17/21	Research legal issues and work on drafting/editing fact section and citing to record docs (Docs. 42, 44).	5.50	6.00	0.50	5.50				7
10/17/21	Discuss w/ RWS re: task assignments and responsibilities heading into the last few days of the MSJ response period making sure that we are covering what needs to be covered and are not missing anything.	0.30	0.30		0.30				7
10/18/21	Phone conference(s) with RSN re P's response to MSJ (0.10), and with Client re same (0.10).	0.20				0.20		0.20	7
10/18/21	Continue drafting P's response to D's MSJ, including legal research, review of deposition transcripts and document production for relevant evidence, drafting emails to and review emails from RSN and Client re same (Docs. 42, 44).	8.90				8.90		8.90	7
10/18/21	Scour the record docs and depositions for use in the MSJ response and edit the MSJ response, including the argument and cites (Docs. 42, 44).	7.00	8.00	1.00	7.00				7
10/19/21	Continue drafting, P's response to D's MSJ, including legal research, review of deposition transcripts and document production for relevant evidence, editing to reduce page count and drafting emails to and review emails from RSN and Client re same.	13.60				13.60		13.60	7
10/19/21	Confer w/ RWS re: whether and which claims to let go and when to let them go	0.20	0.20		0.20				7

1. Pre-Suit

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	and Discuss w/ RWS re drafting and editing the MSJ response (Docs. 42, 44).								
10/19/21	Edit/draft MSJ response, and cite to the evidence (Docs. 42, 44).	7.00	8.00	1.00	7.00				7
10/19/21	Phone conference(s) with RSN re MSJ response (Docs. 42, 44).	0.20				0.20		0.20	7
10/20/21	Phone conference(s) with RSN re P's response to MSJ (Docs. 42, 44).	0.50				0.50		0.50	7
10/20/21	Continue drafting, editing and finalize P's response to D's MSJ, proposed order, and motion for leave to exceed page limits, including legal research, review of deposition transcripts and document production for relevant evidence, drafting emails to and review emails from RSN re same (Docs. 42, 44).	13.00				14.00	1.00	13.00	7
10/20/21	Draft, edit, and cite the docs and depos throughout the MSJ response ensuring coverage, reducing the page count and tightening our presentation and argument (Docs. 42, 44).	13.00	14.00	1.00	13.00				7
10/20/21	Draft motion to exceed page limit and forwarding to RWS for his review and filing with instructions re: how and when to file (0.75); R&R of filed motion and attached MSJ response and exhibits (Doc. 42) (0.10, reduced to 0.00).	0.75	0.85	0.10	0.75				7
10/21/21	Phone conference(s) with Client re MSJ response (0.10), and with RSN re same (0.40).	0.50				0.50		0.50	7
10/22/21	R&R court order granting motion to exceed.	0.10	0.10		0.10				7
10/22/21	Exchange emails with RSN re granting of motion to exceed pages and filing of	0.10				0.10		0.10	7

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	P's response to MSJ.								
10/22/21	R&R of filing of EN MSJ response.	0.00	0.10	0.10	0.00				7
11/12/21	R&R of UT MSJ reply (Doc. 47).	2.00	2.00		2.00				7
11/13/21	Confer w/ RWS re UT reply to MSJ (Doc. 47).	1.00	1.00		1.00				7
11/15/21	Draft email to Client re D's MSJ (Docs. 39, 42, 44, 47).	0.10				0.10		0.10	7
11/16/21	Begin drafting P's sur-reply to D's MSJ, including review of depo transcripts and case documents (Doc. 50).	2.80				2.80		2.80	7
11/17/21	Continue legal research, review of deposition transcripts and other case documents and drafting P's sur-reply to D's MSJ (Doc. 50).	2.50				2.50		2.50	7
11/18/21	R&R and editing of RWS's draft sur-reply to MSJ (3.50, reduced to 3.00); R&R of RWS's filed motion for leave to file surreply (Doc. 50) (0.10, reduced to 0.00).	3.00	3.60	0.60	3.00				7
11/18/21	Continue legal research, review of deposition transcripts and other case documents and draft, edit and finalize sur-reply to D's MSJ, motion for leave to file and proposed order (Doc. 52).	4.20				4.20		4.20	7
11/19/21	Review D's response to P's motion to file sur-reply and determine no reply to D's response is necessary (Doc. 51).	0.20				0.20		0.20	7

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
11/19/21	R&R of UT's response to EN's motion for leave to file surreply (Doc. 51).	0.10	0.10		0.10				7
2/15/22	R&R of Court order denying UT's MSJ and denying as moot EN's motion to file surreply (Doc. 66) (1.00); confer w/ RWS re same (0.50).	1.50	1.50		1.50				7
2/15/22	Review order denying MSJ (Doc. 66) (0.60) and phone conference with RSN re same (0.50).	1.10				1.10		1.10	7
	<b>Phase 7 Totals</b>	<b>153.10</b>	<b>71.90</b>	<b>7.40</b>	<b>64.50</b>	<b>89.60</b>	<b>1.00</b>	<b>88.60</b>	
9/23/21	Exchange emails with RSN re exclusion of PGlick in other WD Tex case against UT and review court order re same.	0.40				0.40		0.40	8.1
9/23/21	Email w/ RWS re exclusion of PGlick in a different UT case on the potential impact to our case.	0.40	0.40		0.40				8.1
11/10/21	Confer with UT on intended motion to exclude PGlick as expert (Doc. 49).	0.10	0.10		0.10				8.1
11/12/21	Exchange emails with OC re opposition to motion to exclude PGlick (Doc. 49).	0.10				0.10		0.10	8.1
11/12/21	Confer w/ RWS re UT's motion to exclude PGlick (Doc. 49).	0.50	0.50		0.50				8.1
11/16/21	Review D's motion to exclude PGlick and emails from OC re same and changing motion to reflect it is opposed (Doc. 49).	0.40				0.40		0.40	8.1
11/16/21	R&R of UT's motion to exclude PGlick report (2.00); legal research re same (1.50) (Doc. 49).	3.50	3.50		3.50				8.1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
11/17/21	Review D's motion to exclude PGlick (Doc. 49).	0.30				0.30		0.30	8.1
12/7/21	Confer w/ RWS re responding to motion to exclude (Doc. 53).	1.50	1.50		1.50				8.1
12/7/21	Phone conference(s) with RSN re motion to exclude PGlick (Doc. 53).	1.50				1.50		1.50	8.1
12/8/21	Draft suggestions for the response to motion to exclude (Doc. 53).	2.50	2.50		2.50				8.1
12/10/21	Begin legal research on admission of expert testimony re discrimination, review of D's motion to exclude PGlick, PGlick depo transcript and report, email from RSN re same, and drafting of response to motion (Doc. 53).	3.10				3.10		3.10	8.1
12/12/21	Continue legal research and drafting response to motion to exclude PGlick (Doc. 53).	6.20				6.20		6.20	8.1
12/13/21	Continue legal research, review of PGlick report and depo, edits of RSN and drafting response to motion to exclude PGlick (Doc. 53).	10.50				10.50		10.50	8.1
12/13/21	Draft and forward to RWS more thoughts on attack against motion to exclude (Doc. 53).	2.75	3.00	0.25	2.75				8.1
12/14/21-2	R&R and edit RWS's final draft of response to motion to exclude. (Doc. 53).	1.50	1.50		1.50				8.1
12/14/21-1	Continue legal research, review of deposition testimony, and drafting and finalizing response to motion to exclude PGlick and proposed order re same (Doc. 53).	12.60				12.60		12.60	8.1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
12/16/21	Draft email to Client re motion to exclude PGlick (Docs. 49, 53).	0.20				0.20		0.20	8.1
12/17/21	Draft email to PGlick re Plaintiff's response to Defendant's motion to exclude, PGlick's deposition, and implicit bias issues (Docs. 49, 53).	0.20				0.20		0.20	8.1
12/21/21	R&R of UT's reply to motion to exclude (Doc. 54).	2.75	3.00	0.25	2.75				8.1
12/21/21	Review D's Reply to motion to exclude PGlick (Doc. 54).	0.40				0.40		0.40	8.1
1/7/22	Confer w/ RWS re trial prep tasks and assignments and schedule - here two months out.	1.50	1.50		1.50				8.1
1/7/22	Phone conference(s) with RSN re trial preparation, witnesses, exhibits and attorney responsibilities.	1.50				1.50		1.50	8.1
1/24/22	Legal Research re jury instructions and begin drafting same (Doc. 58).	4.80				4.80		4.80	8.1
1/24/22-1	Exchange emails with OC re witness for trial and making UT witnesses available without subpoenas.	0.20				0.20		0.20	8.1
1/24/22-2	R&R of efforts to reach agreements w/ UT by RWS re witness production and timing.	0.00	0.25	0.25	0.00				8.1
1/25/22-1	Phone conference(s) with RSN re trial strategy and prep.	0.20				0.20		0.20	8.1
1/25/22-2	Draft email to RSN re trial strategy and preparation including jury questionnaire and review prior questionnaires (1.10); Draft emails to and review emails from	1.90				1.90		1.90	8.1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	experts advising of trial setting and need for testimony (0.60); draft email to outside attorney regarding conducting focus group (0.20).								
1/25/22-3	Confer w/ RWS re trial prep and scheduling and RWS's proposed assignments and schedule.	0.75	1.00	0.25	0.75				8.1
1/26/22	Phone conference(s) with Client re trial preparation and witnesses.	0.90				0.90		0.90	8.1
1/27/22	Confer w/ RWS to speed up our schedule and assigned tasks.	0.25	0.25		0.25				8.1
1/27/22	Draft emails to and review emails from OC re same and witness availability (0.20); begin legal research and drafting jury charge (2.60); draft email to and review email from Client regarding witness availability (0.30).	3.10				3.10		3.10	8.1
1/28/22	Continue drafting jury charge, including legal research re same, for <b>Equal Pay Act</b> , "Cat's Paw," motivating factor, <b>retaliation</b> , and other issues ( <b>Doc. 58</b> ), and draft emails to and review emails form RSN re same (10.20, reduced to 8.20).	8.20				10.20	2.00	8.20	8.1
1/28/22	Draft email to OC re stipulating to <b>Equal Pay Act</b> elements (0.20, reduced to 0.00); draft email to OC re proposed juror questionnaire and review questionnaires and motions from previous cases (0.30).	0.30				0.50	0.20	0.30	8.1
1/28/22	RWS and I propose draft jury charges and discuss Cat's Paw instruction and language.	1.25	1.50	0.25	1.25				8.1
1/29/22	Revise jury charge and legal research re same ( <b>Doc. 58</b> ) (2.60, reduced by 1.00 for <b>Equal Pay Act</b> and <b>retaliation</b> claims); review exhibits and prepare exhibit	6.80				7.80	1.00	6.80	8.1

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	list (Doc. 58) (4.90); draft emails to and review emails from RSN re same (0.30).								
1/29/22	RWS and I continue to review our proposed Cat's Paw jury instruction, and agree to use it in the case.	0.50	0.50		0.50				8.1
1/30/22	Editing jury Charge (Doc. 58).	0.75	1.00	0.25	0.75				8.1
1/30/22	Review potential exhibits and draft exhibit list (Doc. 58), and review emails from and draft emails to RSN re same (10.30); draft email to Client regarding trial prep, contacting witnesses, and student evaluations (0.40).	10.70				10.70		10.70	8.1
1/30/22	Respond to RWS's request to identify source of a spreadsheet used in SWood depo.	0.50	0.50		0.50				8.1
1/31/22	Phone conference with Client re witnesses, exhibits, settlement, trial issues generally (1.70); phone conferences with potential witnesses (1.80); review documents as potential exhibits and draft exhibit list (6.80).	10.30				10.30		10.30	8.1
1/31/22	Confer w/ RWS and EN re trial prep.	0.75	1.00	0.25	0.75				8.1
2/1/22	Additional editing of jury charge (Doc. 58).	1.50	1.50		1.50				8.1
2/1/22	Meet w/ EN and JHorn and RWS to prep for trial testimony and to get ready and on the same page re approach and demeanor.	2.50	3.00	0.50	2.50				8.1
2/1/22	Edit jury Charge (1.00, reduced to 0.75); R&R of EN's forwarded docs to	7.00	8.50	1.50	7.00				8.1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	consider for trial exhibits (2.50, reduced to 2.00); confer w/ RWS re motion in limine (0.50) and draft motion in limine (2.50, reduced to 2.00); draft voir dire (2.00, reduced to 1.75) (all Doc. 58).								
2/1/22	Phone conference with RSN re pretrial filings (0.50); review and edit motion in limine and voir dire questions (0.50); draft emails to and review emails from outside attorney and RSN re focus group (0.30); d raft emails to and review emails from Client and JHorn re trial exhibits including student evaluation documents and possible motion in limine re children before marriage (0.60); draft emails to and review emails from OC and RSN re depo designation and calling witnesses (0.40); review case documents for exhibits and draft exhibit lists and draft emails to Client and RSN re same (10.10) (all Doc. 58).	12.40				12.40		12.40	8.1
2/2/22-1	Phone conferences with potential witnesses including students and professors (2.30); phone conferences with Client re same and case documents (0.70); phone conferences and emails with RSN re pretrial filings (0.50); review, revise and finalize motion in limine, jury charge, witness and voir dire (Doc. 58) (3.30); review potential exhibits and revise exhibit list (4.90 (Doc. 58).	11.70				11.70		11.70	8.1
2/2/22-2	R&R and editing of exhibit list (1.00), and of witness list (0.75) (Doc. 58); final review of pretrial filings before filing (Doc. 58) (1.50); R&R of UT's pretrial filings (3.00, reduced to 2.50); confer re same w/ RWS (0.50) (Doc. 57).	6.25	6.75	0.50	6.25				8.1
2/3/22	Review pretrial filings filed by UT and legal research in response to Motion in Limine and similarly situated employees (Doc. 57).	2.90				2.90		2.90	8.1

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/7/22	R&R of RWS's analysis of UT's pretrial filings (Doc. 57).	0.50	0.50		0.50				8.1
2/7/22	Research on damages and evidence required in federal court on EN's claims.	1.50	1.50		1.50				8.1
2/7/22	Draft emails to and review emails from OC regarding identifying documents on Plaintiff's exhibit list, errors re same and review exhibits regarding same (1.30); review D's motion in limine and draft email to RSN regarding same and issues to address (1.10); draft email to OC re jury questionnaire (0.10); review D's exhibit list and exhibits and draft objections re same (3.40).	5.90				5.90		5.90	8.1
2/8/22	R&R of RWS's research on medical treatment re UT's motion in limine issues (Docs. 57, 63).	0.25	0.25		0.25				8.1
2/8/22	Continue review of defendant's exhibits and draft objections; draft email to RSN re same (2.90); phone conference with RSN re same (0.20) (Doc. 62); continue review of documents for revised exhibit list (2.60).	5.70				5.70		5.70	8.1
2/8/22	Draft emails to and review emails from OC re jury questionnaire (0.30); legal research regarding admissibility of testimony concerning medical treatment (0.50).	0.80				0.80		0.80	8.1
2/8/22	R&R of RWS's objections to UT exhibits and confer re same (Doc. 62).	1.00	1.50	0.50	1.00				8.1
2/9/22	R&R of UT's objections to EN's pretrial filings (Doc. 60) (1.00); R&R of UT's responses to MILimine (Doc. 61) (1.50).	2.50	2.50		2.50				8.1
2/9/22	Review, edit, and legal research re plaintiff's response to UT's motion in limine	1.30				1.30		1.30	8.1

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	and legal research re same (Doc. 63).								
2/9/22	Draft and file objections to portions of UT's motion in limine w/ portions RWS edited reviewed (Doc. 63).	1.50	1.50		1.50				8.1
2/10/22	Draft opening statement, including research and review of other opening statements.	3.10				3.10		3.10	8.1
2/10/22	Review Defendant's objections to plaintiff's exhibits and motion in limine and legal research re same (Docs. 60, 61).	1.00				1.00		1.00	8.1
2/11/22	Work w/ RWS on more voir dire ideas.	0.50	0.50		0.50				8.1
2/11/22	Continue work on opening including review of case documents (2.10); draft revised jury questionnaire and emails to OC regarding same (0.40); draft revised statement of case (0.70); draft email to Client re meeting for trial preparation (0.20, reduced to 0.00); draft email to and review emails from RSN re additional questions/ideas for voir dire (0.40); draft emails to and review emails from OC re juror questionnaire and providing video copies of depositions (0.30).	3.90				4.10	0.20	3.90	8.1
2/14/22	R&R of order excluding PGlick completely (Doc. 64) (1.00); confer w/ RWS re same (0.20).	1.20	1.20		1.20				8.1
2/15/22	Confer w/ RWS re attending a jury voir dire training session in prep for trial.	0.00	0.25	0.25	0.00				8.1
2/15/22	R&R of RWS motion to submit juror questionnaire (Doc. 65).	0.25	0.25		0.25				8.1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/15/22	Review and revise jury questionnaire and draft emails to and review emails from OC re same (0.70); draft emails to and review emails from OC re producing witnesses without subpoenas and phone conference with OC re same (0.30); phone conferences with RSN re pretrial conference, questions to be asked, and voir dire (0.80); prepare for final pretrial conference including review of UT's objections to plaintiff's exhibits and response to same, plaintiff's objections to UT's exhibits, and arguments re motions in limine and drafting notes re same (3.80); draft descriptive exhibit list with short descriptions of P's exhibits (4.30); draft emails to and review emails from PGlick re exclusion (Doc. 64) (0.30).	10.20				10.20		10.20	8.1
2/16/22	Draft email to and review email from PGlick regarding filing motion for reconsideration of order to exclude (Doc. 71).	0.20				0.20		0.20	8.1
2/16/22	Draft email to RSN re preparation for final pretrial conference (0.30); attend and represent Client, present arguments at pretrial hearing (0.90); phone conference with RN regarding same (0.20); draft text to and review text from student witness re potential for move of trial date (0.20).	1.60				1.60		1.60	8.1
2/17/22	Forward Orders to EN and JHorn excluding PGlick and denying MSJ.	0.00	0.10	0.10	0.00				8.1
2/17/22	In person meeting with EN, JHorn, and RSN re preparation for trial including direct exam and trial details.	4.00				4.50	0.50	4.00	8.1

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/17/22	Confer w/ EN and JHorn, and RWS to prepare for trial testimony strategies and techniques on the presentation of self and evidence (4.50, reduced to 4.00); advise Court that EN is available for an April 4th trial setting if needed (0.10); R&R of court text order denying joint motion for entry of juror questionnaire (0.10, reduced to 0.00).	4.10	4.70	0.60	4.10				8.1
2/18/22	Phone conference with RSN re trial settings and witnesses availability (0.50); review emails from and draft emails to OC re same (0.40); draft emails to experts regarding same (0.30).	1.20				1.20		1.20	8.1
2/19/22	Review emails from TGlass re availability for trial (0.10);begin drafting opening statement including review of case documents (3.10.)	3.20				3.20		3.20	8.1
2/19/22	Review email from and draft email to UT professor regarding speaking about case.	0.00				0.20	0.20	0.00	8.1
2/19/22	Legal research and begin drafting motion to reconsider order striking PGlick (Doc. 71).	11.00	12.50	1.50	11.00				8.1
2/20/22	Additional drafting on motion to reconsider excluding PGlick, then hand it off to RWS for additional work (Doc. 71).	3.50	4.00	0.50	3.50				8.1
2/20/22	Continue drafting opening statement including review of case documents.	6.10				6.10		6.10	8.1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/20/22	Review and continue drafting and revising motion to reconsider exclusion of PGlick, legal research regarding same, and draft emails to and review emails from RSN re same (Doc. 71).	1.60				1.60		1.60	8.1
2/22/22	R&R of exhibit RWS is concerned about.	0.50	0.50		0.50				8.1
2/22/22	Phone conference with OC re regarding trial schedule and exhibits (0.40); review of plaintiff's and defendant's exhibits for use in trial and identify problem exhibits/evidence (4.30).	4.70				4.70		4.70	8.1
2/23/22	R&R RWS's amended exhibit list (Doc. 70).	0.50	0.50		0.50				8.1
2/23/22	Confer w/ RWS re several exhibits that RWS is concerned about.	0.50	0.50		0.50				8.1
2/23/22	Continue reviewing exhibits for use in trial, identifying positive and negative issues re same, drafting descriptive exhibit list, drafting first amended exhibit list (Doc 70), and draft emails to and review emails from RSN re same (9.30); phone conference with RSN re same (0.50); draft emails to and review emails from OC and phone conference with OC regarding trial schedule/date and allowing expert witness to be present during trial (0.60); prepare additional documents regarding Client's mental health issues for production and draft emails to and review emails from OC and RSN re same (1.00).	11.40				11.40		11.40	8.1
2/23/22	R&R of RWS's responses to UT objections to proposed new exhibit.	0.20	0.20		0.20				8.1
2/23/22	R&R of additional docs to produce for exhibits and discuss objections from UT w/ RWS.	0.25	0.25		0.25				8.1

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/23/22	Prepare questions for trial: JDalton and ATewfik.	3.50	4.00	0.50	3.50				8.1
2/24/22	Continue drafting and revising motion for reconsideration including legal research, review of depo transcripts an expert report (Doc. 71) (4.60); phone conference with and draft emails to RSN re new exhibit re Client's mental health issues and resolution of UT objections (0.30).	4.90				4.90		4.90	8.1
2/24/22	Confer w/ RWS on alternative proposal for exhibit to UT.	0.25	0.25		0.25				8.1
2/25/22	R&R of new documents from SWood that were not produced before (0.50); confer w/ RWS re same (0.50).	1.00	1.00		1.00				8.1
2/25/22	Continue drafting and revising motion for reconsideration including legal research, review of depo transcripts and expert report and draft email to PGlick re same (Doc. 71).	8.30				8.30		8.30	8.1
2/25/22	Review emails from and draft emails to OC and RSN re new document production from UT and objections to exhibits and review new documents (1.50); phone conference with RSN re same (0.50); phone conferences with Client re A&M professor Welch as witness (0.50)..	2.20				2.20		2.20	8.1
2/26/22	R&R of EN's deposition testimony re Sanjay comments.	0.50	0.50		0.50				8.1
2/26/22	R&R of filed motion for reconsideration (Doc. 71).	0.00	0.10	0.10	0.00				8.1
2/26/22	Develop proposals to RWS for opening and theme of the case.	1.00	1.00		1.00				8.1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/26/22	R&R of new potential exhibit: SWood's eval of EB tenure and discussion w/ RWS re potential relevance and use at trial.	0.75	0.75		0.75				8.1
2/26/22	Confer w/ RWS and EN re highlighting the differences between GFenves, SWood, and others' reasoning in evaluating EN's tenure qualifications.	1.00	1.00		1.00				8.1
2/26/22	Draft response to UT's objections to comparator exhibits, including legal research, review of comparator exhibits, review of defendant's exhibits and pleadings (Doc. 73) (9.80); review exhibits and draft plaintiff's second amended exhibit list (Doc. 72) (1.80); phone conference with RSN and Client re same and trial details, jury instructions and various case facts (0.90).	12.50				12.50		12.50	8.1
2/26/22	R&R of our 2nd amended exhibit list (Doc. 72).	0.30	0.30		0.30				8.1
2/27/22	Discussion w/ RWS re UT's Exhs 16-18.	0.50	0.50		0.50				8.1
2/27/22	Draft emails to and review emails from OC and RSN regarding objection to psychologist report (0.20); draft emails to OC re objections to UT exhibits 16-18 (0.30); continue drafting opening statement (3.50); begin drafting direct exam of Client including thorough review of Client depo transcript (4.10).	8.10				8.10		8.10	8.1
2/27/22	Confer, agree w/ UT for us to pull the therapist report and leave the accommodations request.	0.10	0.10		0.10				8.1
2/28/22	Confer w/ RWS the dropping or retention of EN's Equal Pay Act claim	0.00	0.50	0.50	0.00				8.1

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
2/28/22	Prepare for trial by creating script form questions for cross examination of JDalton, ATewfik, SWood, GFenves, CShockley, CJulien, by reviewing depo summaries and notes and exhibits.	7.50	8.00	0.50	7.50				8.1
2/28/22	Discuss w/ RWS UT's response re their exhs. 16-18, and what to do about it - move to exclude or use it against UT.	0.50	0.50		0.50				8.1
2/28/22	Phone conference with Client re direct examination, questions likely to be asked and additional facts of case including other female profs who were pregnant (1.00); draft emails to and review emails from Client regarding same (0.40); continue review of exhibits, Client's deposition and preparation of direct exam (3.30); review of damages and evidence relating to <b>Equal Pay Act</b> claim and draft email to RSN re dropping claim (2.10, reduced to 0.00); draft email to Court Coordinator re exhibit list and visit to familiarize with courtroom technology (0.10); continue drafting opening statement (3.20).	8.00				10.10	2.10	8.00	8.1
3/1/22	Correct exhibit on GFenves depo notices.	0.10	0.10		0.10				8.1
3/1/22	R&R and edit RWS's draft opening.	3.00	3.00		3.00				8.1
3/1/22	Create script form questions for cross examination of JDalton, ATewfik, SWood by reviewing depo summaries and notes and exhibits.	7.50	8.00	0.50	7.50				8.1
3/1/22	Confer w/ RWS and EN re comparator dossiers - areas of most significant impact and groups of issues to focus on and who to cross with each area.	1.50	1.50		1.50				8.1

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/1/22	Continue drafting opening statement and draft emails to and review emails from RSN and Client re same (4.50); review email from OC regarding GFenves appearance at trial and draft emails to and review emails from RSN re same (0.30); phone conference with RSN re same and witness order (0.30); phone conference with Client re jury charge, facts of the case and potential UT witnesses (1.00); phone conference with UT professor regarding facts of case and being called as witness (0.30); draft emails to and review emails from CCAFR members re discussion about case (0.30); draft emails to and review emails from Court Coordinator re visit to courtroom (0.10); review Court order denying UT objections to comparator evidence (Doc. 74) (0.10); continue review of exhibits and Client transcript and draft direct exam of Client (2.20).	8.80				8.80		8.80	8.1
3/1/22	R&R of court's order overruling UT's objections to our exhibits (Doc. 74).	0.10	0.10		0.10				8.1
3/2/22	Confer w/ RWS re removing exhibits 216-17.	0.25	0.25		0.25				8.1
3/2/22	R&R details provided by RWS re GFenves's contradictory deposition testimony and written statements in the exhibits re request for reconsideration and policies.	0.50	0.50		0.50				8.1
3/2/22	R&R of docs sent by EN re use in trial re comparators.	2.50	2.50		2.50				8.1
3/2/22	Visit court w/ RWS to review technology and make sure everything works.	1.50	1.50		1.50				8.1
3/2/22	Work w/ RWS and UT on scheduling witnesses for trial.	0.00	0.25	0.25	0.00				8.1

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/2/22	Visit Court to review technology (1.50); draft email to and review email from OC regarding Plaintiff dismissing <b>Equal Pay Act</b> claims (0.20 reduced to 0.00); continue drafting opening statement and draft emails to and review emails from Client and RSN re same (2.40); review exhibits and bates numbers to confirm exhibits are correct (4.10); review emails from and draft emails to Client regarding comparators and grant funding and supporting documents (1.50); review exhibits and case documents and continue drafting direct exam of Client (1.80).	11.30				11.50	0.20	11.30	8.1
3/2/22	Create script form questions for cross examination of GFenves, CShockley, and CJulien by reviewing depo summaries and notes and exhibits.	7.50	8.00	0.50	7.50				8.1
3/3/22	Confer w/ RWS and EN re PGlick's testimony allowed ( <b>Doc. 76</b> ) (0.50); communicate w/ PGlick re what he's allowed to testify about and when his testimony will be needed at trial (0.50).	1.00	1.00		1.00				8.1
3/3/22	R&R of court order granting in part our MFReconsideration - allowing PGlick to testify ( <b>Doc. 76</b> ) (0.25); R&R of Court order overruling UT's vaccination objections ( <b>Doc. 77</b> ) (0.10).	0.35	0.35		0.35				8.1
3/3/22	R&R of efforts to exchange exhibits between the parties.	0.10	0.10		0.10				8.1
3/3/22	Verify evidence that modified instructional duty is not to be used against faculty that takes it.	0.50	0.50		0.50				8.1

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RSN: Robert S. Notzon

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/3/22	Draft email to Client regarding productivity in publications and grants after having first child and review documents regarding same (2.60); continue drafting direct exam of Client and preparation of Client for cross examination including review of depo transcript and possible exhibits (3.30); in person meeting with Client to prepare for direct and cross examination (2.40); review Order allowing testimony of expert PGlick (Doc. 76) and draft emails to and review emails from PGlick, RSN and Client re same (0.60); review Defendant's amended exhibit list (0.20); Review Court Order (Doc 77) denying UT objection to vaccination requirement (0.10); review Chair Tewfik's first and amended letters recommending tenure for references to pregnancy and draft email to RSN and Client regarding same (0.30); review male comparator dossiers for references to men taking "Modified Instructional Duty" in Dean's letters regarding tenure as compared to Dean's specific reference in tenure letter for Client and draft email re same and notes re same on descriptive exhibit list (1.40); draft emails to and review emails from OC and support staff regarding sharing of exhibits and exhibits on excel spreadsheets (0.40, reduced to 0.00); draft email to SThompson regarding documents that may be used as exhibits (0.20); phone conferences with RSN regarding trial preparation and supporting evidence (0.80); Phone conferences with Client re same (0.50).	12.60				12.60		12.60	8.1
3/3/22	Create script form questions for cross examination of GFenves, CShockley, CJulien, and DDeere by reviewing depo summaries and notes and exhibits.	7.50	8.00	0.50	7.50				8.1
3/3/22	R&R of UT's amended exhibit list (Doc. 78).	0.25	0.25		0.25				8.1

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 125 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/3/22	Locate and get familiar w/ all evidence supporting EN's strengths and qualifications "metrics" after becoming pregnant at Simons in Fall of 2015.	1.00	1.00		1.00				8.1
3/4/22	Confer w/ SThompson to prepare for testimony	0.50	0.50		0.50				8.1
3/4/22	Draft emails to, review emails from and phone conferences with RSN re case/trial strategy, including comparator Zoldan, statistical evidence of gender bias in tenure decisions, exhibits from experts, "early tenure" issue, statement of the case (2.30); draft emails to and review emails from and phone conference with OC re witness availability and scheduling (1.00); draft emails to Court deputy re coming to court second time to check audio/visual connections for new computer equipment, plaintiff's jury charge, and withdrawal of <b>Equal Pay Act</b> claims (0.30); meet with Court deputy re audio/visual connections for new computer equipment and confer with OC re witness availability (0.70); office conference with Client re preparation to testify and case strategy generally (3.40); continue drafting and revising opening statement (3.50); phone conference with OC re JDalton availability (0.30); phone conferences with potential UT witnesses—professors and CCAFR members (0.70); continue reviewing exhibits for documents to use in direct and cross (2.00).	14.20				14.20		14.20	8.1
3/4/22	Create script form questions for examination of GFenves, CShockley, CJulien, DDeere, and SThompson by reviewing depo summaries and notes and exhibits.	7.50	8.00	0.50	7.50				8.1
3/4/22	Communicate w/ UT re scheduling and witness line up and sharing protocols for trial.	0.50	0.50		0.50				8.1

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 126 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/4/22	Locate and verify GFenves and ATewfik testimony for SThompson to use to support his opinions.	0.50	0.50		0.50				8.1
3/4/22	Schedule w/ colleagues re assistance with voir dire on 3/7.	0.00	0.50	0.50	0.00				8.1
3/4/22	Confirm opposition to UT's MTReconsider Judge Pitman's order allowing PGlick to testify (Doc. 79) (0.10); R&R of UT's motion, including discussion w/ RWS (1.50).	1.60	1.60		1.60				8.1
3/4/22	Propose including SThompson's charts from his report given UT's amended exhibit list.	0.25	0.25		0.25				8.1
3/4/22	Locate evidence of, then discuss w/ RWS, contradictions between ATewfik, SWood, GFenves, data, and external reviewers re EN's qualifications.	2.00	2.50	0.50	2.00				8.1
3/5/22	Create script form questions for examination of DDeere and SThompson by reviewing depo summary, reports, notes and exhibits.	7.50	8.00	0.50	7.50				8.1
3/5/22	Edit the opening again.	0.75	1.00	0.25	0.75				8.1
3/5/22	Confer w/ EN re current job and job searches.	0.50	0.50		0.50				8.1
3/5/22	R&R and edit of RWS's powerpoint opening.	0.50	0.50		0.50				8.1
3/5/22	R&R of EN's thoughts on opening and discuss w/ RWS.	0.75	0.75		0.75				8.1
3/5/22	R&R of RWS response to UT's motion for reconsideration (Doc. 80).	1.25	1.50	0.25	1.25				8.1

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees &amp; Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 127 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/5/22	Continue drafting and revising opening and power point (7.90); review UT's motion for reconsideration re PGlick and draft response (1.90); draft emails to and review emails from Client re case strategy and issues (0.40); office conference with RSN re exhibits, trial pad, and case strategy (0.80); phone conference with potential UT witness/employee (0.80); phone conference with PGlick re report and testifying (1.10); draft emails to and review emails from PGlick re testimony and report (0.30); phone conference with GZhuang re testifying and experiences with Client as professor (0.70); draft questions for GZhuang (0.40); continue drafting direct of plaintiff and review of her deposition and case documents for potential cross exam questions (2.10).	16.40				16.40		16.40	8.1
3/5/22	Create script form questions for examination of SThompson and DDeere by reviewing depo summaries and notes and exhibits.	2.75	3.00	0.25	2.75				8.1
3/5/22	R&R of recommended questions for ATewfik from RWS and EN.	0.50	0.50		0.50				8.1
3/6/22	R&R and feed back of SThompson' proposed demonstrative exhibit.	0.50	0.50		0.50				8.1

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

4. Discovery

5. Blank

6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

8.2 Focus Group

9. Trial

10.1 Post Trial

10.2 Fees & Costs

11. Settlement

12. Workplace Issues

RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 128 of 153**



Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/6/22	Draft emails to, review emails from and phone conferences RSN re case/trial strategy, including exhibits, witness order and time in trial, comparators, and other trial matters (1.60); phone conferences with Client re case strategy (0.80); phone conference with JValvano re testifying (0.30); draft direct questions for JValvano (0.50); draft direct exam of PGlick and phone conference with him re same, including review of his deposition and articles cited (2.60); review TGlass and SThompson reports and prepare exhibits of tables (0.40); draft email to OC re same (0.10); draft and revise opening and opening power point (6.10); continue drafting direct exam of Client and reviewing deposition and case documents to prepare Client for cross-exam (1.20).	13.60				13.60		13.60	8.1
3/6/22	Seek clarification re Ex 73 from EN and RWS (0.50); confer w/ EN clarifications of multiple issues in preparation for crossing UT's representatives (1.50).	2.00	2.00		2.00				8.1
3/6/22	R&R of UT's objections to EN's exhibits in the 2nd Amended List (Doc. 81) (1.00); R&R of UT's proposed lists of unobjected to exhibits for en masse admission at the beginning of trial and discuss w/ RWS (1.00).	1.00	1.00		1.00				8.1
3/6/22	Prepare cross examination of JDalton, ATewfik, SWood, GFenves, CShockley, CJulien, and DDeere by reviewing depo summaries and notes and exhibits and having depo quotes and cites next to every question and answer.	9.50	10.00	0.50	9.50				8.1
	<b>Phase 8.1 Totals</b>	<b>459.75</b>	<b>175.45</b>	<b>14.30</b>	<b>161.15</b>	<b>305.00</b>	<b>6.40</b>	<b>298.60</b>	
2/4/22	Draft emails to and review emails from other attorneys re procedure for focus	0.20				0.50	0.30	0.20	8.2

1. Pre-Suit

4. Discovery

7. MSJ

9. Trial

11. Settlement

RSN: Robert S. Notzon

2. Pleadings

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8.1 Trial Prep

10.1 Post Trial

12. Workplace Issues

RWS: Robert W. Schmidt

3. Rule 16 Case Mgmt.

6. MTD (Doc. 22)

8.2 Focus Group

10.2 Fees & Costs

**Exhibit 3B (Phase), Page 129 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	group and scheduling (0.50, reduced to 0.20 because of scheduling).								
2/4/22	R&R re focus group procedures and scheduling.	0.00	0.20	0.20	0.00				8.2
2/5/22	Attend focus group re case.	1.40				1.40		1.40	8.2
2/7/22	Draft email to and review email from outside attorney regarding focus group and suggestions on opening statement.	0.20				0.20		0.20	8.2
2/19/22	Draft emails to outside attorney regarding conducting focus group.	0.20				0.20		0.20	8.2
2/21/22	Prepare for focus group w/ RWS discussion and review statement of the case and edit same.	1.50	1.50		1.50				8.2
2/21/22	Phone conferences with RSN regarding focus group (0.90); prepare for focus group including draft statement of case and phone conference with outside attorney regarding technique for questioning group members and encouraging dialogue (2.50).	3.40				3.40		3.40	8.2
2/22/22	Prep discussion for focus group this afternoon (1.40); participate in focus group (2.40); post-focus group discussion w/ RWS (0.70).	4.50	4.50		4.50				8.2
2/22/22	Prepare for focus group including draft emails to and review emails from RSN, outside attorney and organizer re process and suggestions re same and draft power point re “early tenure” and counting time (1.70); conduct and observe focus group (2.40); phone conference with RSN re focus group results (0.70)	4.80				4.80		4.80	8.2

1. Pre-Suit  
2. Pleadings  
3. Rule 16 Case Mgmt.

4. Discovery  
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6. MTD (Doc. 22)

7. MSJ  
8.1 Trial Prep  
8.2 Focus Group

9. Trial  
10.1 Post Trial  
10.2 Fees & Costs

11. Settlement  
12. Workplace Issues

RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 130 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	<b>Phase 8.2 Totals</b>	<b>16.20</b>	<b>6.20</b>	<b>0.20</b>	<b>6.00</b>	<b>10.50</b>	<b>0.30</b>	<b>10.20</b>	
3/7/22-1	First day of trial - pretrial prep (3.00); trial (8.00, reduced to 7.50); after-trial prep for Day 2 (5.00).	15.50	16.00	0.50	15.50				9
3/7/22-2	Prepare for Day 1 of Trial, including revising and practicing opening and power point (2.10); draft and revised direct exams for student and JValvano (0.60); draft emails to and review emails from and phone conferences with RSN re voir dire, cross exam of GFenves, exhibits, and other trial matters (0.90); draft emails to and review emails from OC re presenting JValvano and other UT employees as witnesses and availability (0.20); phone conference with Client (0.20).	4.00				4.00		4.00	9
3/7/22-3	Represent Client in Trial: Day 1 of Trial, including opening statement, direct exams of student and Dr. Valvano (7.00)	7.00				7.00		7.00	9
3/7/22-4	Prepare for Day 2 of Trial, including drafting questions for PGlick and reviewing deposition transcript and exhibits for cross exam (2.50); Phone conferences with RSN re case strategy and direct and cross exams of witnesses (0.70).	3.20				3.20		3.20	9
3/8/22-1	Pretrial prep (2.00); trial Day 2 (7.00, reduced to 6.75); after trial prep for Day 3 (9.00, reduced to 8.50).	17.25	18.00	0.75	17.25				9
3/8/22-2	Prepare for Day 2 including phone conferences with PGlick re direct and cross examination, drafting questions for direct, and draft emails to and review emails from PGlick re same (1.30).	1.30				1.30		1.30	9

1. Pre-Suit  
2. Pleadings  
3. Rule 16 Case Mgmt.

4. Discovery  
5. Blank  
6. MTD (Doc. 22)

7. MSJ  
8.1 Trial Prep  
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11. Settlement  
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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 131 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/8/22-3	Represent Client in Trial: Day 2 of trial, including assisting RSN re exhibits, etc.	7.00				7.00		7.00	9
3/8/22-4	Prepare for Day 3 of Trial, including review case documents and exhibits, and draft emails to and review emails from RSN re cross examination of Dean SWood and case exhibits supporting same (4.30); meet with and prepare client for direct exam and cross exam and case strategy generally (2.50); continue drafting and revising direct exam for Client (0.70); continue with preparation of PGlick for direct and cross examination at trial, including review of expert report, deposition transcript and exhibits and drafting of questions (1.70).	9.20				9.20		9.20	9
3/9/22-1	Pretrial prep (1.00); trial (7.00, reduced to 6.75); after-trial prep for Day 4 (9.00, reduced to 8.50).	16.25	17.00	0.75	16.25				9
3/9/22-2	Prepare for Day 3 including direct examination of PGlick and Jennifer Welch.	0.80				0.80		0.80	9
3/9/22-3	Represent Client in Day 3 of trial, including direct exam of PGlick and conferring with RSN re other trial witnesses and matters.	7.00				7.00		7.00	9
3/9/22-4	Prepare for Day 4 of trial including meeting and conferring with Client and Husband re direct examinations and case strategy generally (3.30); assist re RSN re cross exam of Dean SWood (0.50); draft and revise direct exam questions for Client, husband, Jennifer Welch, TGlass and DWasserman, including review of client's deposition, TGlass deposition, case documents and potential exhibits to use (5.40); phone conference with DWasserman re direct exam (0.20).	9.40				9.40		9.40	9
3/10/22-1	Prepare for Day 4, including review of report of TGlass and exhibit tables,	16.40				16.40		16.40	9

1. Pre-Suit

4. Discovery

7. MSJ

9. Trial

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RSN: Robert S. Notzon

2. Pleadings

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8.1 Trial Prep

10.1 Post Trial

12. Workplace Issues

RWS: Robert W. Schmidt

3. Rule 16 Case Mgmt.

6. MTD (Doc. 22)

8.2 Focus Group

10.2 Fees & Costs

**Exhibit 3B (Phase), Page 132 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	finalizing questions, possible exhibits for witnesses (1.50); represent Client in Trial: Day 4 of trial, including direct exams of Plaintiff, Plaintiff's Husband, Dr. Jennifer Welch, DWasserman, and expert TGlass. (7.00); prepare for Day 5, including cross exam of CJulien including review of deposition and case documents (2.80); review jury charge and phone conference with RSN re same (0.50); legal research and draft brief with objections to same, including business judgment instructions (Doc. 86) (3.80); review, draft and exchange edits and emails re proposed jury charge with RSN (0.80).								
3/10/22-2	Pretrial prep (1.00); trial Day 4 (7.00, reduced to 6.75), after-trial prep for Day 5 (11.00); drafting evidence list to be included in the closing arguments (2.00, reduced to 1.75).	20.50	21.00	0.50	20.50				9
3/11/22	Prepare for trial Day 5: Draft closing an power point re same (2.00) and finalize cross of CJulien and collect potential exhibits re same (0.90); represent Client in trial Day 5 including arguing jury charge and wait for jury verdict (10.00).	12.90				12.90		12.90	9
3/11/22	Pretrial prep (0.50); trial Day 5 (10.00, reduced to 9.50).	10.00	10.50	0.50	10.00				9
	<b>Phase 9 Totals</b>	<b>157.70</b>	<b>82.50</b>	<b>3.00</b>	<b>79.50</b>	<b>78.20</b>	<b>0.00</b>	<b>78.20</b>	
3/12/22	Phone conference with RSN re verdict and post-trial issues.	0.40				0.40		0.40	10.1
3/13/22	Phone conference with RSN and Client re verdict and post-trial issues.	0.30				0.30		0.30	10.1
3/13/22	Confer w/ RWS re post trial actions to consider/decide on.	1.50	1.50		1.50				10.1

1. Pre-Suit

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4. Discovery

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 133 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
3/13/22	Request Court to provide RWS and me jurors' contact information for potential feedback.	0.00	0.10	0.10	0.00				10.1
3/14/22	Confer w/ RWS and EN re post trial issues and to do list and assignments.	1.50	1.50		1.50				10.1
3/14/22	R&R of court filings from the last day of trial filed this morning (including the verdict) (Docs. 88-95).	0.50	0.50		0.50				10.1
3/14/22	Phone conference(s) with Client and RSN re post-trial issues including motion for front pay, obtaining trial transcripts and possible appellate issues.	1.50				1.50		1.50	10.1
3/15/22	Legal research on front pay damages and attorney's fees and costs processes and briefing.	1.50	1.50		1.50				10.1
3/16/22	Further discussion w/ RWS re post trial scheduling and briefing.	0.50	0.50		0.50				10.1
3/29/22	Exchange emails with Court personnel re obtaining trial transcripts.	0.00				0.20	0.20	0.00	10.1
3/30/22	Confer w/ RWS re transcripts needed for front pay damages (Doc. 99).	0.25	0.25		0.25				10.1
3/31/22	Order trial transcript from RD testimony	0.00	0.10	0.10	0.00				10.1
4/11/22	Communicate with BDower regarding post trial motions.	0.10	0.10		0.10				10.1
4/14/22	Discuss w/ RWS re drafting front pay motion (Doc. 99).	0.10	0.10		0.10				10.1
4/19/22	Begin drafting motion for judgment and legal research re same (Doc. 99).	1.60				1.60		1.60	10.1

1. Pre-Suit

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3. Rule 16 Case Mgmt.

4. Discovery

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

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9. Trial

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

**Exhibit 3B (Phase), Page 134 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
4/21/22	Continue legal research re compensatory damages and back pay and drafting of motion for judgment (Doc. 99).	1.90				1.90		1.90	10.1
4/22/22	Research authorities on allocating emotional damages between past and future for post-trial motions.	0.50	0.50		0.50				10.1
4/25/22	Continue legal research re compensatory damages, back pay and interest, review of DDeere and TGlass testimony, and draft motion for judgment (Doc. 99).	4.10				4.10		4.10	10.1
4/26/22	Consult w/ EN re front pay evidence at trial for use in post-trial motion (Doc. 99) (0.25); further research on emotional damages (0.50); advise EN w/ RWS re ongoing employment issues w/ UT post trial (0.50); discuss w/ RWS and EN the evidence presented during trial for the posttrial motion for front pay damage (0.50).	1.75	1.75		1.75				10.1
4/26/22	Exchange emails with Client and RSN re motion for judgment, Client's trial testimony, and possible strategies (Doc. 99).	0.40				0.40		0.40	10.1
4/26/22	Continue legal research re reinstatement and front pay, review of TGlass and DDeere trial transcripts and draft motion for judgment (Doc. 99).	3.50				3.50		3.50	10.1
4/27/22	R&R and editing of RWS's draft motion for judgment (Doc. 99).	1.00	1.00		1.00				10.1
4/27/22	Continue legal research re compensatory damages, front and back pay, reinstatement and interest, review trial transcripts of DDeere and TGlass, and draft and revise motion for judgment (Doc. 99).	12.80				12.80		12.80	10.1

1. Pre-Suit

2. Pleadings

3. Rule 16 Case Mgmt.

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6. MTD (Doc. 22)

7. MSJ

8.1 Trial Prep

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9. Trial

10.1 Post Trial

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11. Settlement

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
4/28/22	Phone conference(s) with OC re motion for judgment and possible settlement discussions (Doc. 99).	0.20				0.20		0.20	10.1
4/28/22	R&&R of filed motion for entry of judgment.	0.10	0.10		0.10				10.1
4/28/22	Continue legal research re motion for judgment, including front pay, reinstatement, and interest, review transcripts of Nikolova, Welch, TGlass and DDeere trial testimony, and draft, revise and finalize motion for judgment and proposed order (Doc. 99).	7.20				7.20		7.20	10.1
5/8/22	Discuss w/ RWS re advising EN on her current employment situation w/ UT and how that affects the front pay damages.	0.50	0.50		0.50				10.1
6/20/22	R&R of UT's response to motion for judgment and discuss w/ RWS regarding contents and our reply (Docs. 102, 104).	0.75	0.75		0.75				10.1
6/21/22	Exchange emails with Client and RSN re UT response to motion for judgment (Doc. 102).	0.20				0.20		0.20	10.1
6/21/22	Further discussion w/ RWS re our view of UT response and our proposed reply (Docs. 102, 104).	0.50	0.50		0.50				10.1
7/6/22	Begin drafting reply to UT's response re motion for judgment, including review response, trial testimony and exhibits of UT expert re front pay, legal research re same (Doc. 104).	4.70				4.70		4.70	10.1
7/7/22	Discuss w/ RWS re our reply to UT's response to motion for judgment (Doc.	0.25	0.25		0.25				10.1

1. Pre-Suit  
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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	104).								
7/7/22	Continue drafting reply to UT response to motion for damages, including review of UT expert testimony and exhibits re front pay, other trial testimony supporting front pay, legal research re same (7.80), and phone conferences with TGlass (0.20) and RSN (0.20) re same (Doc. 104).	8.20				8.20		8.20	10.1
7/8/22	R&R of our reply to UT's motion to motion for judgment (Doc. 104).	0.10	0.10		0.10				10.1
7/19/22	Further discuss w/ RWS re recent tenure notice from UT and impact on front pay damages and direction forward.	0.50	0.50		0.50				10.1
7/19/22	Draft advisory to Court re UT granting Client tenure and impact on front pay (0.20), and phone conference with OC (0.10) re same (Doc. 105).	0.30				0.30		0.30	10.1
7/25/22	Phone conference(s) with OC (0.20) and RSN (0.50) re UT granting tenure and possible appeal/settlement discussions.	0.70				0.70		0.70	10.1
8/22/22	Review court order re compensatory damages, back pay and interest and directing further briefing (Doc. 106).	0.10				0.10		0.10	10.1
8/22/22	R&R of court's order (Doc. 106).	0.10	0.10		0.10				10.1
8/23/22	Discuss w/ RWS order entering judgment (Doc. 106).	0.50	0.50		0.50				10.1
8/23/22	Phone conference(s) with RSN re Court order re compensatory damages, back pay and interest and directing notice of motions to amend (Doc. 106).	0.50				0.50		0.50	10.1

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	<b>Phase 10.1 Totals</b>	<b>61.10</b>	<b>12.70</b>	<b>0.20</b>	<b>12.50</b>	<b>48.80</b>	<b>0.20</b>	<b>48.60</b>	
3/30/22	Exchange emails with RSN and RMcKnight re motion for attorneys fees and post trial schedule.	0.20				0.20		0.20	10.2
6/23/22	Exchange emails with RMcKnight motion for attorneys fees and presentation of hours.	0.30				0.30		0.30	10.2
6/24/22	Phone conference(s), and exchange emails, with RSN re motion for attorneys fees and recoverable expenses.	0.40				0.40		0.40	10.2
6/24/22	Research on recoverable costs (0.50); discuss w/ RWS re recoverable work on pleaded but not decided claims (0.50).	1.00	1.00		1.00				10.2
7/27/22	Discuss w/ RWS re attorney's fees issues for our motion.	0.50	0.50		0.50				10.2
8/23/22	Discuss w/ RWS and REM re attorney's fees application and court's recent order (Doc. 106).	0.40	0.40		0.40				10.2
8/23/22	Phone conference with RSN and RMcKnight re attorney's fee briefing.	0.40				0.40		0.40	10.2
9/6/22	Phone conferences with and draft emails to and review emails from OC re joint status report and draft same.	1.70				1.70		1.70	10.2
	<b>Phase 10.2 Totals</b>	<b>4.90</b>	<b>1.90</b>	<b>0.00</b>	<b>1.90</b>	<b>3.00</b>	<b>0.00</b>	<b>3.00</b>	
8/29/19-2	Phone conference(s) with UT in house counsel re case merits and possible	0.30				0.30		0.30	11

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	resolution.								
1/28/22	Draft email to OC re settlement offers, mediation, and ADR.	0.30				0.30		0.30	11
5/4/22	Exchange emails with OC re request for extension and possible settlement conversations (Doc. 100).	0.10				0.10		0.10	11
7/25/22	Call w/ opposing counsel and RWS regarding case, potential mediation, and paths forward (0.50); further discussion w/ RWS re the call with opposing counsel (0.50).	1.00	1.00		1.00				11
7/26/22	Exchange emails with OC re follow up call on tenure grant and possible settlement negotiations.	0.10				0.10		0.10	11
7/28/22	Discuss w/ RWS re potential mediation issues and approaches.	0.50	0.50		0.50				11
7/28/22	Exchange emails with RSN re motion for attorneys fees and call with Client re same, possible settlement negotiations and appeal issues.	0.30				0.30		0.30	11
7/29/22	Phone conference(s) with Client, JHorn and RSN re UT granting tenure, motion for attorneys fees, possible settlement negotiations and appeal issues (1.00); phone conference with RSN re same (0.30) and OC (0.20) re same; draft email to Client, JHorn and RSN re same (0.40).	1.90				1.90		1.90	11
7/29/22	Discuss w/ RWS, EN, and JHorn re case and potential resolution and options otherwise (1.00); discuss w/ RWS following conversation w/ EN and JHorn (0.50); work on draft w/ RWS of options and issues moving forward with the	2.00	2.00		2.00				11

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	posttrial litigation (0.50).								
8/1/22	Further draft communication from RWS and me to EN re potential resolution of the case.	0.50	0.50		0.50				11
8/2/22	Discuss w/ RWS EN's and JHorn's thoughts on potential resolution issues.	0.50	0.50		0.50				11
8/3/22	Discuss mediator selection w/ RWS.	0.25	0.25		0.25				11
8/15/22	Discuss w/ RWS re approach to take with UT given the lack of response from UT re paths forward.	0.50	0.50		0.50				11
8/15/22	Exchange emails with RSN re no response from UT re possible settlement negotiations and motion for judgment and attorneys fees.	0.30				0.30		0.30	11
8/16/22	Phone conference(s) with OC re possible settlement negotiations (0.30) and with RSN re same, motion for attorneys fees and possible appellate issues (0.40).	0.70				0.70		0.70	11
8/17/22	Discuss w/ RWS re continued delay from UT and now new tack with potential magistrate judge mediator.	0.50	0.50		0.50				11
8/17/22	Exchange emails with OC re possible settlement negotiations and attorneys fees issues (0.20) and RSN (0.10) re same, supplemental briefing on front pay, motion for attorneys fees.	0.30				0.30		0.30	11
8/18/22	Research on magistrate judge options for mediation of the case.	0.25	0.25		0.25				11

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RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
8/18/22	Legal research re Magistrate Judge Lane.	0.30				0.30		0.30	11
	<b>Phase 11 Totals</b>	<b>10.60</b>	<b>6.00</b>	<b>0.00</b>	<b>6.00</b>	<b>4.60</b>	<b>0.00</b>	<b>4.60</b>	
9/3/19	Exchange emails with Client and RSN re communicating with department chair regarding filing suit and ongoing discrimination issues regarding current pregnancy and assignments.	0.40				0.40		0.40	12
9/3/19	Emails w/ RWS and EN e: strategy and advice for EN on communicating with UT admin re EN's plans to file suit and possible discrimination in teaching duties.	0.40	0.40		0.40				12
9/4/19	Exchange emails with Client re communications with Chair ATewfik and other professors re lawsuit and ongoing work issues.	0.20				0.20		0.20	12
9/5/19	Conference w/ EN re: her communications and interactions w/ UT folks at this start to the litigation (0.50); R&R of UT's policy re parental leave (0.50); R&R of EN's contract w/ UT (0.75, reduced to 0.50); R&R of documents uploaded to the pregnancy folder on Dropbox (3.00, reduced to 2.50); further review and editing email to ATewfik for EN (0.50); strategy discussion w/ EN re ECE Chair ATewfik's email about the lawsuit (0.50).	5.00	5.75	0.75	5.00				12
9/5/19	Exchange emails with Client and RSN re communications with Chair ATewfik, including concerns re ongoing work and possible discrimination, communications with him re suit and search for other employment.	0.90				1.10	0.20	0.90	12

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RSN: Robert S. Notzon

RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
9/6/19	Advise EN on ECE Chair AT's request to meet with EN (0.25); R&R and editing of JHorn's edits to EN's proposed response email to ATewfik (0.25); update from EN re: emails sent to ATewfik and others at UT yesterday (0.25).	0.75	0.75		0.75				12
9/9/19	Additional advice to EN re: communicating with ECE Chair ATewfik.	0.75	1.00	0.25	0.75				12
9/9/19	Exchange emails with Client and RSN re response to Chair ATewfik's request for meeting.	0.30				0.30		0.30	12
9/10/19	Advise EN re: Dean's office communication re continued employment (0.50); advise EN re communications and methods and devices in effort to protect attorney client confidentiality (0.50); discussion w/ EN re: potential evidence to gather for use in the case re pregnancies (0.25).	1.25	1.25		1.25				12
9/10/19	Exchange emails with Client and RSN re not using work computer for anything case related, preserving evidence and emails, advice re speaking with others about case and documenting pregnancy issues.	0.80				0.80		0.80	12
9/11/19	Exchange emails with Client re letter of support following Statesman article on lawsuit.	0.00				0.20	0.20	0.00	12
9/12/19	R&R of current modified instructional duty (MID) communications between EN and UT and advise on how to proceed.	0.50	0.50		0.50				12
9/13/19	Review email(s) from RSN and EN re taking Modified Instructional Duty and leave without pay for birth of new child.	0.20				0.20		0.20	12

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RWS: Robert W. Schmidt

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9/13/19	R&R on issues reported publicly by UT on UT's parental leave policy.	0.25	0.25		0.25				12
9/16/19	Exchange emails with Client re taking Modified Instructional Duty and leave without pay for birth of new child.	0.20				0.20		0.20	12
9/30/19	Draft email(s) to and review email(s) from: Client and RSN re anonymous letter re case and Client's self-nomination to Dean review committee.	0.30				0.30		0.30	12
9/30/19	Advise EN on her speaking out against SWood's evaluation as a Dean (0.25); discuss w/ RWS and EN re anonymous message of support and advice on what to do about it (0.50).	0.75	0.75		0.75				12
10/2/19	Draft email(s) to and review email(s) from: Client re Dean review committee (0.40 reduced to 0.20).	0.20				0.40	0.20	0.20	12
10/2/19	R&R of emails re EN serving on Dean review committee.	0.10	0.10		0.10				12
10/3/19	Draft email(s) to and review email(s) from: Client re dean review committee.	0.00				0.30	0.30	0.00	12
10/3/19	R&R of the final draft of EN's comments sent to ECE Dept.	0.25	0.25		0.25				12

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
10/4/19	Discuss w/ EN issues associated with her comments on Dean and advice on future communications (0.50); advise EN against anything other than a thank you to the anonymous comment author and discussion re this issue (0.50); R&R of report of multiple positive feedback messages following EN's comments on SWood (0.10); draft proposed response email for EN to be sent to anonymous commenter (0.10); discuss w/ RWS and EN re draft response email to anonymous commenter (0.50); comment on EN's comments and advice on future communications (0.50).	2.20	2.20		2.20				12
10/4/19	Exchange emails with Client and RSN re anonymous letter received by Client relating to filing of case and Dean review committee.	0.10				0.10		0.10	12
10/8/19	R&R of another anonymous message to EN (0.10); confer w/ RWS re same (0.30).	0.40	0.40		0.40				12
10/9/19	R&R of Prof. Goodenough's positive comments in support of EN (0.10); confirm EN's use of private email account and private hardware so that UT doesn't have access to her communications with her attorneys (0.25).	0.35	0.35		0.35				12
11/22/19	Advise EN on counseling and the various paths/effects of counseling with the litigation (0.50); EN confirming counseling assistance following recent birth and update on progress and needs (0.25).	0.75	0.75		0.75				12
4/7/20	Answer questions from EN re GFenves leaving UT and relevance to the case.	0.25	0.25		0.25				12
4/9/20	R&R of EN's notes of P&T meeting and Q&A (0.50); receive update from EN	1.00	1.00		1.00				12

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	on P&T meeting occurring on campus and advise re issues to explore and note proposed by EN (0.50).								
4/9/20	Draft email(s) to and review email(s) from: Client re provost's office zoom meeting re promotion and tenure for assistant professors and Client questions re same.	0.40				0.40		0.40	12
4/16/20	Confer w/ RWS regarding issues of EN's interactions with co-workers and UT representatives while still employed at UT	0.25	0.25		0.25				12
4/16/20	Exchange emails with RSN and Client re Dean SWood's promotion and tenure zoom meeting for engineering faculty and possible Client attendance, questions and concerns re same (0.50) and phone conference with RSN re same (0.30).	0.80				0.80		0.80	12
4/21/20	R&R of emails w/ ATewfik re: JHorn.	0.25	0.25		0.25				12
4/21/20	Review email(s) from Client re interactions with Chair ATewfik re possible hiring of JHorn as assistant.	0.30				0.30		0.30	12
4/23/20	Advise EN on how to communicate with faculty and students when providing recommendations and separating any discussions about testifying in the litigation.	0.50	0.50		0.50				12
4/24/20	Clarify advice to EN.	0.25	0.25		0.25				12

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
5/7/20-3	Exchange emails with Client and RSN re email to Client allegedly from Dean SWood asking Client to text her; need to report email to UT Information Tech dept (0.30); and phone call with Client re same (0.30).	0.60				0.60		0.60	12
5/7/20-4	Update from UT IT identifying contact email as spam.	0.00	0.10	0.10	0.00				12
6/25/20	Phone conference(s) with Client and JHorn re facts of case, possible witnesses and theories, and ongoing employment issues impacting Client's mental health and future tenure chances, including retaliation and peer teaching evaluation by CJulien.	1.00				1.00		1.00	12
7/1/20	Advise EN re purchase of a personal computer and whether UT would have access to the work contained on the computer if UT related work.	0.50	0.50		0.50				12
7/1/20	Exchange emails with Client and RSN re use of personal computer and UT's possible rights of access.	0.30				0.30		0.30	12
7/16/20	Exchange emails with Client re negative annual review and questions re case deadlines.	0.20				0.20		0.20	12
7/16/20	R&R of EN questions re case deadlines and various ongoing employment issues with her.	0.00	0.10	0.10	0.00				12
7/17/20	R&R of ECE Chair response to EN's concerns re eval.	0.10	0.10		0.10				12
7/21/20	Advise EN on response to Chair on negative eval.	0.25	0.25		0.25				12

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
7/21/20	Draft email to and review emails from Client re negative annual review and impact on case, tenure prospects and job search/mitigation of damages.	0.30				0.30		0.30	12
7/22/20	Draft email(s) to and review email(s) from: Client re negative annual review, responding to department chair re same and impact on tenure chances.	0.50				0.50		0.50	12
7/24/20	R&R of EN's document provided re the Faculty Annual Review and editing response from EN.	0.00	0.10	0.10	0.00				12
8/24/20	Advise EN on communicating with persons re the case in multiple circumstances (co-workers, students, UT administration) and the potential liabilities to the case.	0.75	1.00	0.25	0.75				12
8/24/20	Exchange emails with Client re search for new position and communications re same.	0.20				0.20		0.20	12
8/26/20	Phone conference(s) with Client re case status, communications with others re lawsuit, search for new tenured position and evidence supporting case.	0.80				0.80		0.80	12
9/9/20	Advise EN again on interacting with faculty and administration on the best ways to communicate.	0.50	0.50		0.50				12
9/30/20	Advise EN on how to communicate with CJulien.	0.25	0.25		0.25				12
10/9/20	Exchange emails with Client and RSN re Client's mental health situation, advice and diagnosis of doctor, need for FMLA including advice on email to department chair.	0.70				0.70		0.70	12

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10/9/20	Confer w/ RWS re EN's precarious mental health and needed treatment/therapy and email to department chair re same..	0.50	0.50		0.50				12
10/12/20	Confer w/ RWS on best way to handle EN condition.	0.75	0.75		0.75				12
10/12/20	Exchange emails with Client and RSN re Client's mental health situation, need for FMLA and impact on case and future tenure prospects, including advice on presenting issues to department chair.	1.30				1.30		1.30	12
10/13/20	R&R of RWS's advice to EN and approval.	0.10	0.10		0.10				12
10/13/20	Exchange emails with Client and RSN re mental health issues, impact on case/tenure and possible student witness.	0.30				0.30		0.30	12
10/14/20	Phone conference(s) with Client re mental health issues, need to request FMLA, impact on case and future tenure and discussions with department chair and draft emails to and review emails from Client re same.	0.70				0.70		0.70	12
10/20/20	Advise EN on FMLA issues during her current employment.	0.25	0.25		0.25				12
10/20/20	Exchange emails with EN re mental health issues and need for FMLA.	0.20				0.20		0.20	12
11/9/20	Advise EN on and editing email communication to JSpeitel re leave.	0.75	0.75		0.75				12
11/9/20	Phone conference(s) with RSN re EN communications with Dean's office about leave and probationary extensions and draft emails to and review emails from EN and RSN re same.	0.40				0.40		0.40	12

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11/12/20	Follow-up advice to EN and edit email communications w/ UT admin for EN.	1.00	1.00		1.00				12
11/12/20	Review email(s) from Client and RSN re communications with Dean's office.	0.10				0.10		0.10	12
11/18/20	Exchange emails with EN re need for mental health counseling and possible mental health providers.	0.40				0.40		0.40	12
11/30/20	Exchange emails with Client re Client's FMLA request because of mental health.	0.20				0.20		0.20	12
1/5/21	Confer w/ RWS re EN public statements about lawsuit.	0.25	0.25		0.25				12
1/5/21	Phone conference(s) with RSN re Client statement about lawsuit to high school classmates and review emails re same.	0.30				0.30		0.30	12
4/12/21	Advise EN on communications re job searches and information contained in letters and emails.	0.75	0.75		0.75				12
4/12/21	Exchange emails with Client re job search and rejections and obtaining documents (0.30); exchange emails with RSN re Client's job search and rejections and review Client docs re same (0.70).	1.00				1.00		1.00	12
4/12/21	R&R of EN's job search docs and rejections, and discuss same w/ RWS.	0.50	0.50		0.50				12
4/13/21	Exchange emails with client re rejection on job application	0.10				0.10		0.10	12
6/7/21	Confer w/ RWS re EN's current employment situation and the impact on the litigation.	0.50	0.50		0.50				12

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Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
6/7/21	Phone conference(s) with Client re mental health issues resulting from tenure decision and depression, inability to work and need to request leave (0.10), then with RSN re JDalton deposition and Client's mental health issues and need for leave re tenure issues (0.40).	0.50				0.50		0.50	12
6/8/21-5	Phone conference(s) with Client's psychologist re mental health issues relating to tenure denial and need for additional leave.	0.40				0.40		0.40	12
6/9/21-4	Phone conference(s) with Client's therapist re need for reasonable accommodations.	0.30				0.30		0.30	12
6/12/21	Confer w/ RWS and EN re UT's expressed desire to run a criminal background check on EN at this time.	0.50	0.50		0.50				12
6/16/21	Phone conference(s) with Client re deposition and mental health issues relating to tenure denial.	0.30				0.30		0.30	12
6/28/21	R&R of another anonymous letter EN received today (0.25); with RWS, advise EN re same (0.50).	0.75	0.75		0.75				12
6/28/21	Exchange emails with Client and RSN re anonymous letter and review of same.	0.30				0.70	0.40	0.30	12
7/16/21	Exchange emails with Client and OC re Client's mental health issues relating to tenure denial and need for leave without pay.	0.30				0.30		0.30	12
7/19/21	Exchange emails with Client re email from Chair requesting meeting, Client's mental health issues relating to tenure issue and need to take leave of	0.30				0.40	0.10	0.30	12

1. Pre-Suit  
2. Pleadings  
3. Rule 16 Case Mgmt.

4. Discovery  
5. Blank  
6. MTD (Doc. 22)

7. MSJ  
8.1 Trial Prep  
8.2 Focus Group

9. Trial  
10.1 Post Trial  
10.2 Fees & Costs

11. Settlement  
12. Workplace Issues

RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 150 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
	absence/reasonable accommodation.								
7/20/21	Exchange emails with Client re responding to Chair's email re need to take leave of absence and leave will be without pay.	0.30				0.30		0.30	12
7/21/21	Exchange emails with Client re responding to further emails from chair re mental health issues relating to tenure denial and Client's decision to request leave of absence.	0.40				0.40		0.40	12
7/21/21	Advise EN w/ RWS re communication w/ new ECE chair.	0.25	0.25		0.25				12
7/27/21	Phone conference(s) with Client's psychologist re mental health issues due to tenure denial and need for leave.	0.50				0.50		0.50	12
7/28/21	R&R of EN's request for reasonable accommodation.	0.10	0.10		0.10				12
7/28/21	Phone conference(s) with RSN re Client's request for leave without pay due to psychological issues (0.40); draft email to OC re same (0.10).	0.50				0.50		0.50	12
7/29/21	Exchange emails with Client and RSN re need for medical leave due to psychological issues re tenure denial, request for leave from UT, and impact on case.	1.30				1.30		1.30	12
4/18/22	Advise EN re ongoing employment issues with UT post trial.	0.25	0.25		0.25				12
7/11/22	Exchange emails with Client re request for unpaid leave in 2022-23 due to Client's ongoing mental health issues.	0.30				0.30		0.30	12

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RSN: Robert S. Notzon  
RWS: Robert W. Schmidt  
**Exhibit 3B (Phase), Page 151 of 153**

Date	Task Description	Time	RSN Bill	RSN Adjust	RSN Final	RWS Bill	RWS Adjust	RWS Final	Phase
7/15/22	Review email(s) from Client re request for leave due to mental health issues.	0.10				0.10		0.10	12
7/16/22	Discuss w/ RWS re advising EN on her current employment situation w/ UT and how that affects the front pay damages.	0.10	0.10		0.10				12
7/16/22	Exchange emails with Client re request for leave without pay due to mental health issues.	0.20				0.20		0.20	12
7/18/22	Exchange emails with Client and RSN re UT granting Client tenure.	0.30				0.30		0.30	12
7/18/22	Discuss w/ RWS and EN re recent promotion-to-tenure notice from UT president and the impact on front pay damages and direction forward.	0.50	0.50		0.50				12
7/21/22	Phone conference(s) with Client, JHorn and RSN re UT granting tenure and impact on front pay (1.00) and with RSN (0.40) re same.	1.40				1.40		1.40	12
	Phase 12 Totals	48.75	27.90	1.55	26.35	23.80	1.40	22.40	
	All Phases Totals	2076.85	1077.35	157.30	920.05	1259.75	102.95	1156.80	

**Time of Robert McKnight for work on the motion for fees and costs (all Phase 10.2):**



Date	Task	Time
8/30/22	Review TELA rate survey in order to advise RWS and RSN on rates (0.30); phone conference with RWS and RSN, advising re rates, their declarations, and supporting declarations (1.00); follow-up email to RWS and RSN with sample declarations and explanations of what they should contain and why (0.20).	1.50
9/8/22	Review DWiley draft declaration and email him re same (0.20); review SHayes draft declaration and email RWS re same (0.10).	0.30
9/9/22	Email RWS and RSN re compensability of SThompson time versus purely disparate impact time (0.20); email RWS and RSN re materials for Local Rule CV-54 conferral (0.20).	0.40
9/11/22	Review and mark edits on RSN's draft declaration (0.40), same for RSN's draft declaration (0.20), then return to them (NC); review DWeiser draft declaration and email RWS re suggestions (0.20); begin drafting motion from <i>Carter</i> filing (1.30).	2.10
9/12/22	Resume and complete first draft of motion (3.20), then forward to RWS and RSN for review (NC); review RSN and RWS comments and edit accordingly (0.30); Local Rule CV-54 conference with AHilton, RWS and RSN (0.30); draft certificate of conference (0.20) and forward to AHilton for her review and elaboration (NC); further revisions to the motion, including incorporation of some material addressed in new drafts of their declarations (2.00); adapt and update REM declaration from <i>Carter</i> filing (0.10); finalize tabulation of costs and prepare AO 133 (0.30); additional edits to motion (0.50).	6.90
9/13/22	Shepardize and cite check cases in motion (0.70); review RWS's final declaration, now signed, and make sure all appropriate cites are included in the motion (0.20); prepare proposed order (0.10); update certificate of conference to include the material received by email from AHilton (NC).	1.00
	<b>Total</b>	<b>12.20</b>

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RSN: Robert S. Notzon

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**Exhibit 3B (Phase), Page 153 of 153**